

EXHIBIT 1

Declaration of Perry B. Wickham

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Trial Attorney (MD Bar)
U.S. Department of Justice
Environment & Natural Resources Division
Natural Resources Section
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Washington, D.C. 20044-7611
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CENTER FOR BIOLOGICAL
DIVERSITY, et al.,

Plaintiffs

v.

UNITED STATES BUREAU OF LAND
MANAGEMENT, et al,

Defendants.

Case No. 2:19-cv-01915-GMN-EJY

**DECLARATION OF PERRY B.
WICKHAM IN SUPPORT OF FEDERAL
DEFENDANTS' OPPOSITION TO
MOTION FOR PRELIMINARY
INJUNCTION**

I, Perry B. Wickham, hereby declare and state as follows:

1. I am the Field Manager for the Bureau of Land Management's (BLM) Tonopah Field Office in Nevada. I have served as the Field Manager in Tonopah since June 10, 2019, (acting) and October 6, 2019, (permanent) and have worked for the BLM for over 12 years. I make this declaration in support of Federal Defendant's Opposition to Motion for Preliminary Injunction. The matters stated in this declaration are true of my own knowledge and, if necessary, I could and would competently testify to them.
2. As the Field Manager, I am responsible for overseeing all BLM activities within the Tonopah Field Office jurisdiction, including issuing decisions related to exploration projects.

1 The Rhyolite Ridge Exploration Project (NVN-097202) and South Infill Exploration Project
2 (NVN-097262) are within the Tonopah Field Office jurisdiction and are managed by the
3 Tonopah Field Office.

4 3. On August 28, 2018, Paradigm Minerals USA Corp. and its successor Ioneer
5 USA Corporation (collectively “mining company”) submitted to BLM’s Tonopah Field Office a
6 notice to conduct exploration operations for the Rhyolite Ridge Exploration Project. A true and
7 correct copy of the August 28, 2018, notice is attached hereto as **ATTACHMENT A**.

8 4. On September 21, 2018, the mining company submitted to BLM’s Tonopah Field
9 Office a new revised notice to conduct exploration operations for the Rhyolite Ridge Exploration
10 Project and indicated in this correspondence that the revised notice fully replaced the August 28,
11 2018, notice. A true and correct copy of the September 21, 2018, notice is attached hereto as
12 **ATTACHMENT B**.

13 5. On October 10, 2018, BLM’s Tonopah Field Office issued a decision on the
14 amount of financial guarantee required to ensure reclamation. A true and correct copy of the
15 October 10, 2018, decision is attached hereto as **ATTACHMENT C**.

16 6. On December 5, 2019, the mining company submitted to BLM’s Tonopah Field
17 Office a letter indicating that it “has ceased all operations” under the Rhyolite Ridge Exploration
18 Project. A true and correct copy of this letter is attached hereto as **ATTACHMENT D**.

19 7. After having reviewed the mining company’s December 5, 2019, letter regarding
20 the Rhyolite Ridge Exploration Project, I, as Field Manager of the Tonopah Field Office, issued
21 a decision “Relinquishment of Notices Accepted – Notices Terminated, Reclamation Required.”
22 The decision indicates that all surface disturbance and mining related activities, except
23 reclamation, are no longer authorized for the Rhyolite Ridge Exploration Project. A true and
24 correct copy of this decision is attached hereto as **ATTACHMENT E**.


25 8. On October 2, 2018, the mining company submitted to BLM’s Tonopah Field
26 Office a notice to conduct exploration operations for the South Infill Exploration Project. A true
27 and correct copy of this October 2, 2018, notice is attached hereto as **ATTACHMENT F**.

1 9. On October 17, 2018, BLM's Tonopah Field Office issued a decision on the
2 amount of the financial guarantee required to ensure reclamation. A true and correct copy of the
3 October 17, 2018, decision is attached hereto as **ATTACHMENT G**.

4 10. On December 5, 2019, the mining company submitted to BLM's Tonopah Field
5 Office a letter indicating that it "has ceased all operations" under the South Infill Exploration
6 Project. A true and correct copy of this letter is attached hereto as **ATTACHMENT H**.

7 11. After having reviewed the mining company's December 5, 2019, letter regarding
8 the South Infill Exploration Project, I, as Field Manager of the Tonopah Field Office, issued a
9 decision "Relinquishment of Notices Accepted – Notices Terminated, Reclamation Required."
10 The decision indicates that all surface disturbance and mining related activities, except
11 reclamation, are no longer authorized for the South Infill Exploration Project. A true and correct
12 copy of this decision is attached hereto as **ATTACHMENT I**.

13
14 I declare under penalty of perjury that the foregoing is true and correct. Signed this
15 December 6, 2019 in Tonopah, Nevada.

16
17 
18 Perry B. Wickham

ATTACHMENT A



August 28, 2018

RECEIVED-MAILROOM

2018 AUG 29 P 1:10

BUREAU OF LAND MANAGEMENT
TONOPAH FIELD OFFICE

via Federal Express (773086964043)

Mr. Timothy Coward
Bureau of Land Management
Tonopah Field Office
P.O. Box 911 (1553 South Main Street)
Tonopah, Nevada 89049-0911

RE: Paradigm Minerals USA Corp., Rhyolite Ridge Exploration Project – New Notice,
Esmeralda County, Nevada

Dear Mr. Coward:

On behalf of Paradigm Minerals USA, Corp. (PMU), EM Strategies, Inc. (EM Strategies) is submitting a new Notice for exploration activities planned at the Rhyolite Ridge Exploration Project (Project). Please provide EM Strategies with a courtesy copy of all correspondence for the Project. If you have any questions or need additional information, please contact our office at (775) 753-9496.

Sincerely,

EM Strategies, Inc.

A handwritten signature in blue ink, appearing to read "K Sweet", written over a horizontal line.

Kaitlin C. Sweet
Elko Manager

Enclosure

cc: Mr. Matt Weaver - PMU (w/enclosure via email: mweaver@globalgeo.com.au)



Notice**Rhyolite Ridge Exploration Project**

August 28, 2018

Paradigm Minerals USA Corp. (PMU) intends to conduct exploration activities at the Rhyolite Ridge Exploration Project (Project) located in Sections 19, 20, 28, 29, and 32, Township 1 South, Range 37 East (T1S, R37E), Mount Diablo Base and Meridian in Esmeralda County, Nevada (Project Area). PMU plans to drill bore holes, drill and install a ground water monitoring/piezometer well, and conduct test pit excavations, accessed by existing roads and planned overland travel routes. The locations of planned exploration activities are shown on Figure 1, Appendix 1. Planned surface disturbance under the Notice totals **3.81 acres**. PMU files this Notice pursuant to the provisions of 43 Code of Federal Regulations (CFR) 3809.300.

1. Name of Operator: Paradigm Minerals USA Corp.

Name of Corporate Contact: Matt Weaver, Senior Vice President

Mailing Address: Paradigm Minerals USA Corp.
241 Ridge Street, Suite 210
Reno, Nevada 89501

Tax Identification Number:

Owners of Mining Claims: Paradigm Minerals Arizona Corp
241 Ridge Street, Suite 210
Reno, Nevada 89501

2. Bureau of Land Management (BLM) Serial Numbers and Names of Claims on Which Disturbance will Occur:

Claim Name	NMC #
SLM 15	NMC1171550
SLM 17	NMC1171552
SLM 19	NMC1171554
SLM 28	NMC1171563
SLM 30	NMC1171565
SLM 32	NMC1171567
SLM 34	NMC1171569
SLM 53	NMC1171588
SLM 55	NMC1171590
SLM 57	NMC1171592
SLM 58	NMC1171593
SLM 60	NMC1171595
SLM 62	NMC1171597

Claim Name	NMC #
SLM 64	NMC1171599
SLM 69	NMC1171604
SLM 7	NMC1171542
SLM 74	NMC1171609
SLM 87	NMC1171622
SLM 88	NMC1171623
SLM 89	NMC1171624
SLM 90	NMC1171625
SLM 91	NMC1171626
SLM 92	NMC1171627
SLM 93	NMC1171628
SLM 94	NMC1171629

RHYOLITE RIDGE EXPLORATION PROJECT
ESMERALDA COUNTY, NEVADA

PARADIGM MINERALS USA CORP.
NOTICE

3. Location of Proposed Activities: The Project is located approximately 40 air miles west-southwest from Tonopah (Figure 1) and can be reached from Tonopah by traveling west 34 miles on United States Highway 6, then turning south onto State Highway 265 and traveling 21 miles, just past the town of Silver Peak. Turn west onto Coyote Road and travel another 17 miles until reaching the Project Area. The Project Area is located on the Rhyolite Ridge SW 7 ½ minute United States Geological Survey (USGS) Quadrangle map. The location is shown on Figure 1, Appendix 1.
4. Existing Disturbance in the Project Area: There are several existing tracks and trails located within the Project Area, as shown on Figure 1.
5. Project Description: PMU plans to conduct exploration drilling at the Project from up to 11 constructed drill sites, one ground water monitoring/piezometer well site, and 24 test pit excavations accessed via existing roads and planned overland travel routes. Drill sites (including the well site) will be constructed with an average working area of 100 feet long by 50 feet wide. Sumps approximately 20 feet long by ten feet wide by 6.75 feet deep will be excavated within site disturbance to collect drill cuttings and manage fluids. Only two of the 11 planned boring locations and the ground water monitoring/piezometer well are anticipated to require the use of sumps. The ground water monitoring well will be completed with four-inch diameter steel casing up to 360 feet deep. The test pits will be excavated within working areas with the dimensions of 30 feet long by 30 feet wide. The test pits will be excavated with the approximate dimensions of 20 feet long by three feet wide and up to ten feet deep. Approximately 15,100 linear feet of overland travel routes will be utilized with an approximate disturbance width of six feet (undisturbed ground between the tracks not included). PMU has justified that the overland travel width of six feet is practical as the geotechnical explorations (test pits and non-well boreholes) will only be accessed once and will be backfilled and abandoned immediately upon completion. PMU's planned exploration activities are shown on Figure 1.

The planned well will be drilled to a depth of 360 feet using a reverse-circulation (RC) rig. The geotechnical holes will be completed with a rotary drill to a maximum depth of 100 feet. Hollow-stem augers will be used to advance the boring through overburden and diamond core drilling will be used to advance the borings in rock. Water for the Project will be obtained by a private contractor. The drill crew and geologists will use 4-wheel drive vehicles to access the site. Support vehicles and equipment for the exploration drilling activities include pick-up trucks, pipe trucks, and water trucks.

The depth to the water table in the areas of proposed drilling is unknown; however, for the bond calculation assumptions, 100 feet below ground surface is assumed for reclamation and hole abandonment estimations.

6. Approximate Surface Disturbance: The following specifics apply to the Project:

Planned Surface Disturbance

- Twenty-four test pit excavation areas with the approximate dimensions of 30 feet long by 30 feet wide = **0.50 acre**;

- Twelve drill sites (including the well site) constructed with the approximate dimensions of 100 feet long by 50 feet wide = **1.38 acres**; and
- Approximately 15,100 linear feet of overland travel routes with a running width (disturbance of two tracks) of six feet = **2.08 acres**.

Total Planned Surface Disturbance = 3.96 acres.

7. Schedule of Activities: PMU anticipates that Project activities will commence in September 2018. Reclamation activities will likely be completed in the Summer of 2020; however, revegetation activities are limited by the time of year during which they can be effectively implemented. Site conditions or yearly climatic variations may require that this schedule be modified to achieve revegetation success. Once a site or road is no longer needed for exploration, the site will be reclaimed.
8. Measures Taken to Prevent Unnecessary or Undue Degradation: Operations will be conducted consistent with 43 CFR 3809.415 and 3809.420.
 - Existing access routes and overland travel routes will be used.
 - Only nontoxic fluids will be used in the drilling process.
 - PMU will not knowingly disturb, alter, injure, or destroy any scientifically important paleontological deposits; or any historical or archaeological site, structure, building, or object. If PMU discovers any cultural or paleontological resource that might be altered or destroyed by operations, the discovery will be left intact and reported to the authorized BLM officer.
 - Any survey monuments, witness corners, or reference monuments will be protected to the extent economically and technically feasible.
 - Public safety will be maintained throughout the life of the Project. All equipment will be maintained in a safe and orderly manner.
 - All solid wastes will be removed from the Project Area and disposed of in a state, federal, or local designated site.
 - Hazardous substances utilized at the Project will include diesel fuel, gasoline, and lubricating grease. Approximately 100 gallons of diesel fuel and gasoline will be stored in fuel delivery systems on the drill rig and support vehicles. Approximately 50 pounds of lubricating grease will be stored on the drill rig or transported by drill trucks. In the event that hazardous or regulated materials were spilled, measures will be taken to control the spill and the BLM and the Nevada Division of Environmental Protection (NDEP) will be notified as required. Any hazardous substance spills will be cleaned immediately and any resulting waste will be transferred off site in accordance with all applicable local, state, and federal regulations. Contract drillers will maintain spill kits on site for use in case of a spill.

- PMU will comply with all applicable state and federal fire laws and regulations and all reasonable measures will be taken to prevent and suppress fires in the Project Area.
 - Best Management Practices (BMPs) for sediment control will be utilized during construction, operation, and reclamation to minimize sedimentation from disturbed areas. Sumps could include, but not be limited to, fabric or certified weed-free straw bale filter fences, siltation or filter berms, and downgradient drainage channels in order to prevent unnecessary or undue degradation to the environment.
 - All drill holes will be abandoned in accordance with the State of Nevada Regulations for Water Well and Related Drilling (Nevada Administrative Code [NAC]/Nevada Revised Statutes [NRS] Chapter 534), specifically per NAC 534.4371.
 - All reasonable steps will be taken to minimize the introduction of noxious weeds and to limit the spread of any existing infestations.
9. Reclamation: Reclamation will be completed to the standards described in 43 CFR 3809.420. Exploration drill sites will be regraded to the natural contour and slope of the surrounding topography and to the pre-Project condition. All spoil piles from sediment trap construction will be stockpiled at drill site locations and recontoured at such time as the drill site will no longer be used. Test pit excavations will be backfilled once the samples are collected. All earthwork will be completed with a Caterpillar Backhoe, or equivalent equipment. Overland travel will be ripped and seeded. Reclamation of the piezometer/ground water monitoring well will be cutting the casing to ground surface, plugging the drill hole with cement, and reclaiming the typical-sized drill pad and sump. The regraded and/or ripped areas will then be seeded with a BLM-approved seed mix, at the appropriate time of year for optimum seed sprouting and plant growth. The seeding will be completed with a manual broadcaster and raked. The reclaimed surfaces will be left in a textured or rough condition (small humps, pits, etc.). The broadcast seed application rate will vary based on the shrub, forb, and grass species selected. Native seed will be used when available. Only certified weed-free seed will be used for reclamation seeding. Post-reclamation maintenance will consist of remedial dirt work and reseeding, if required.
- Site monitoring for stability and revegetation success will be conducted on an annual basis, during the spring or fall, or until attainment of the revegetation standards established in the *Nevada Guidelines for Successful Revegetation for the Nevada Division of Environmental Protection, the Bureau of Land Management, and the USDA Forest Service* (Instruction Memorandum #NV 99-013).
10. Reclamation Cost Estimate: The reclamation cost estimate (Appendix 2), as required by 43 CFR 3809.552, is attached to this Notice. The Standardized Reclamation Cost Estimator, Version 1.4.1, Build 017b including 2018 cost data, with the 2018 Mobilization/Demobilization worksheet was used to estimate reclamation costs for the Project.

The following assumptions have been made in calculating the reclamation cost estimate:

- Twelve constructed drill sites approximately at 100 feet long by 50 feet wide will be recontoured, ripped, and seeded.
- Twenty-four test pits with the approximate excavation dimensions of 20 feet long by three feet wide and 20 feet deep (maximum) will be backfilled. The larger test pit working areas with the approximate dimensions of 30 feet long by 30 feet wide will be recontoured and seeded.
- Abandonment of one ground water monitoring well with a casing diameter of four inches and average depth of 360 feet.
- Approximately 15,100 linear feet of overland travel routes with a running width (disturbance of two tracks only) of six feet will be ripped and seeded.
- A Caterpillar Backhoe, or equivalent equipment, will be used for all reclamation earthwork including recontouring and scarifying sumps. The disturbed area will be seeded by a manual broadcast method and raked.
- The total estimated reclamation cost for the total planned disturbance contained in this Notice is **\$33,203.00**.

RHYOLITE RIDGE EXPLORATION PROJECT
ESMERALDA COUNTY, NEVADA

PARADIGM MINERALS USA CORP.
NOTICE

11. Signature Page

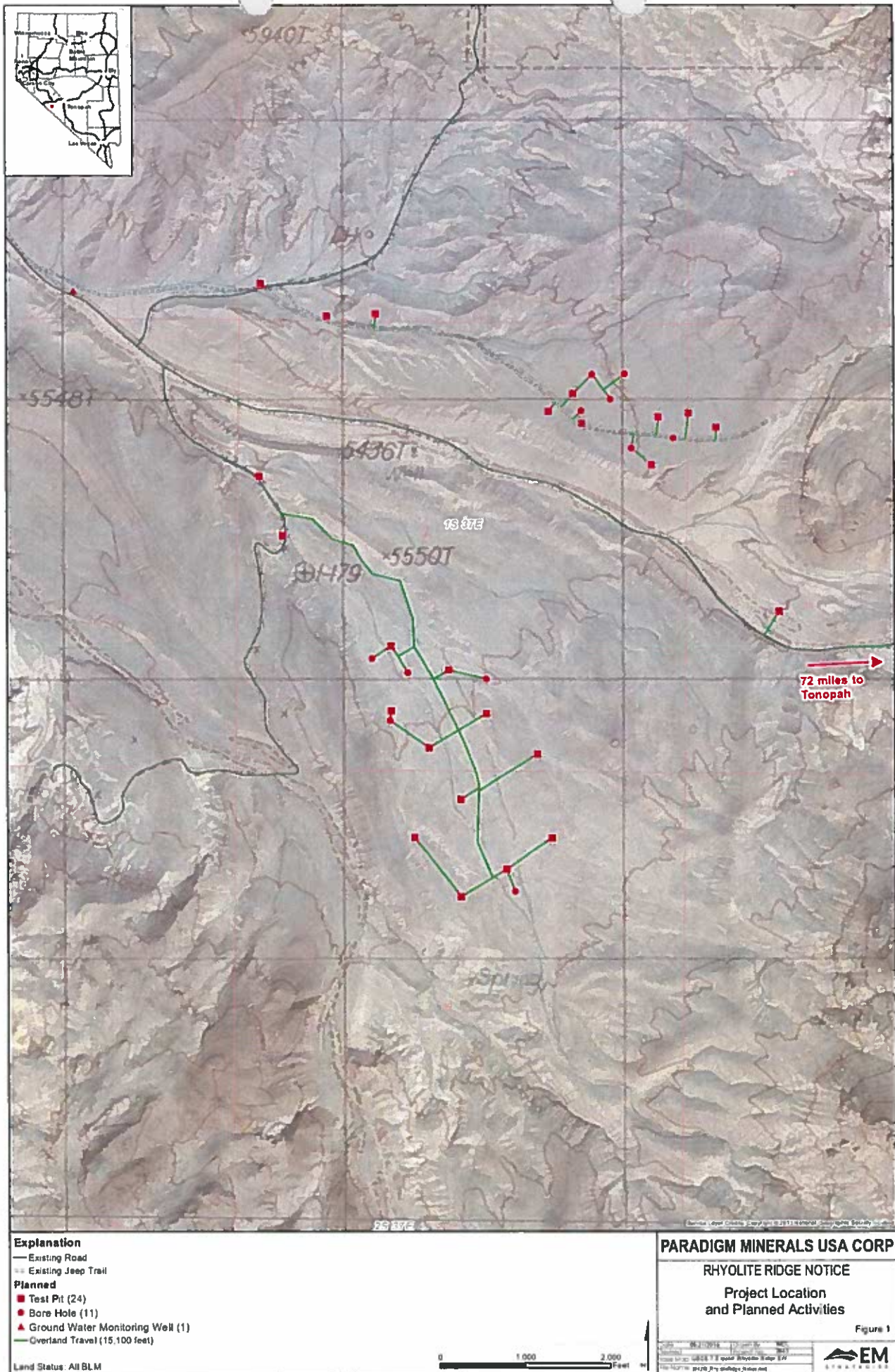
Paradigm Minerals USA Corp.

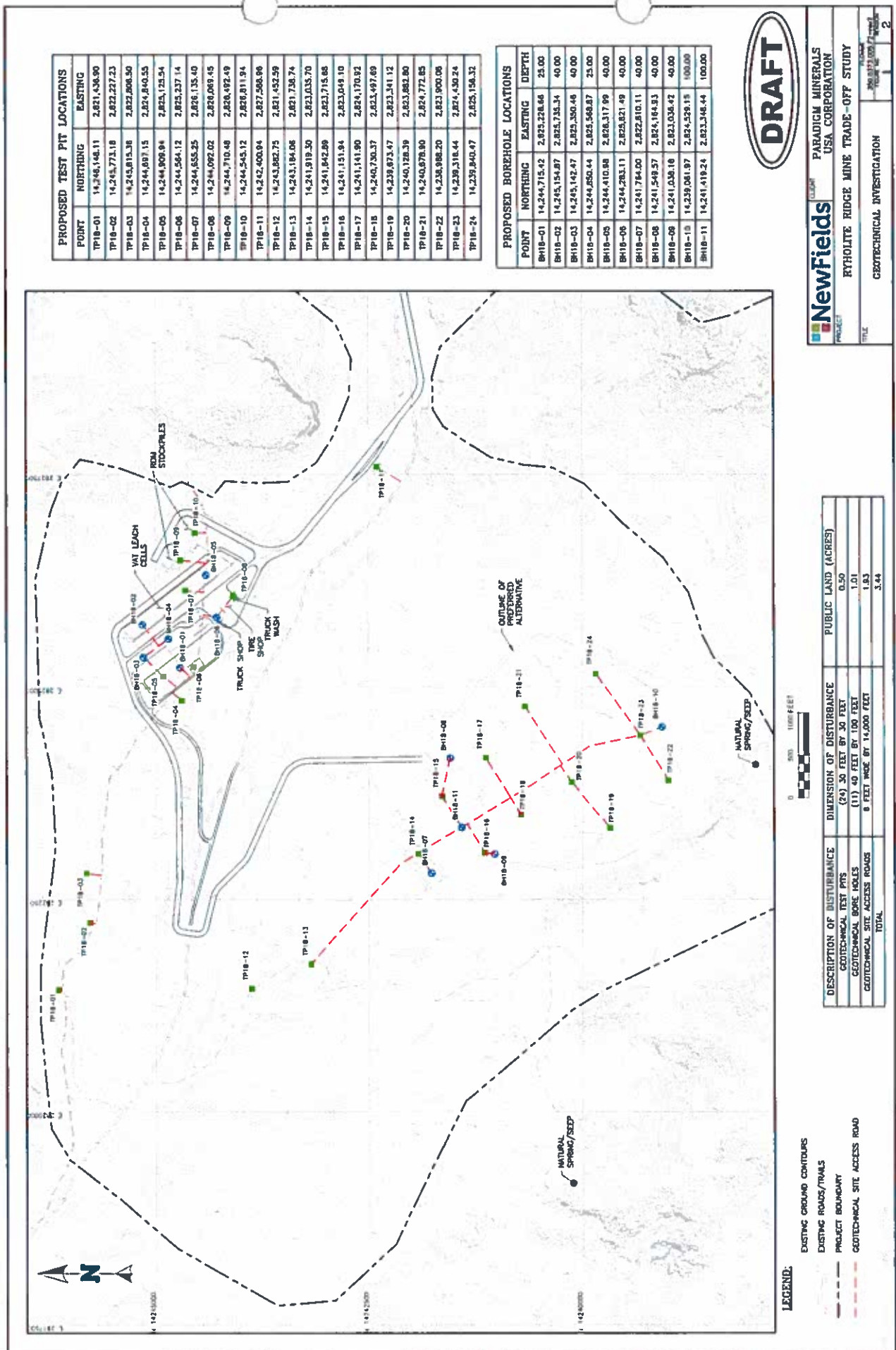
By 
Matt Weaver, Senior Vice President

Date September 21, 2018

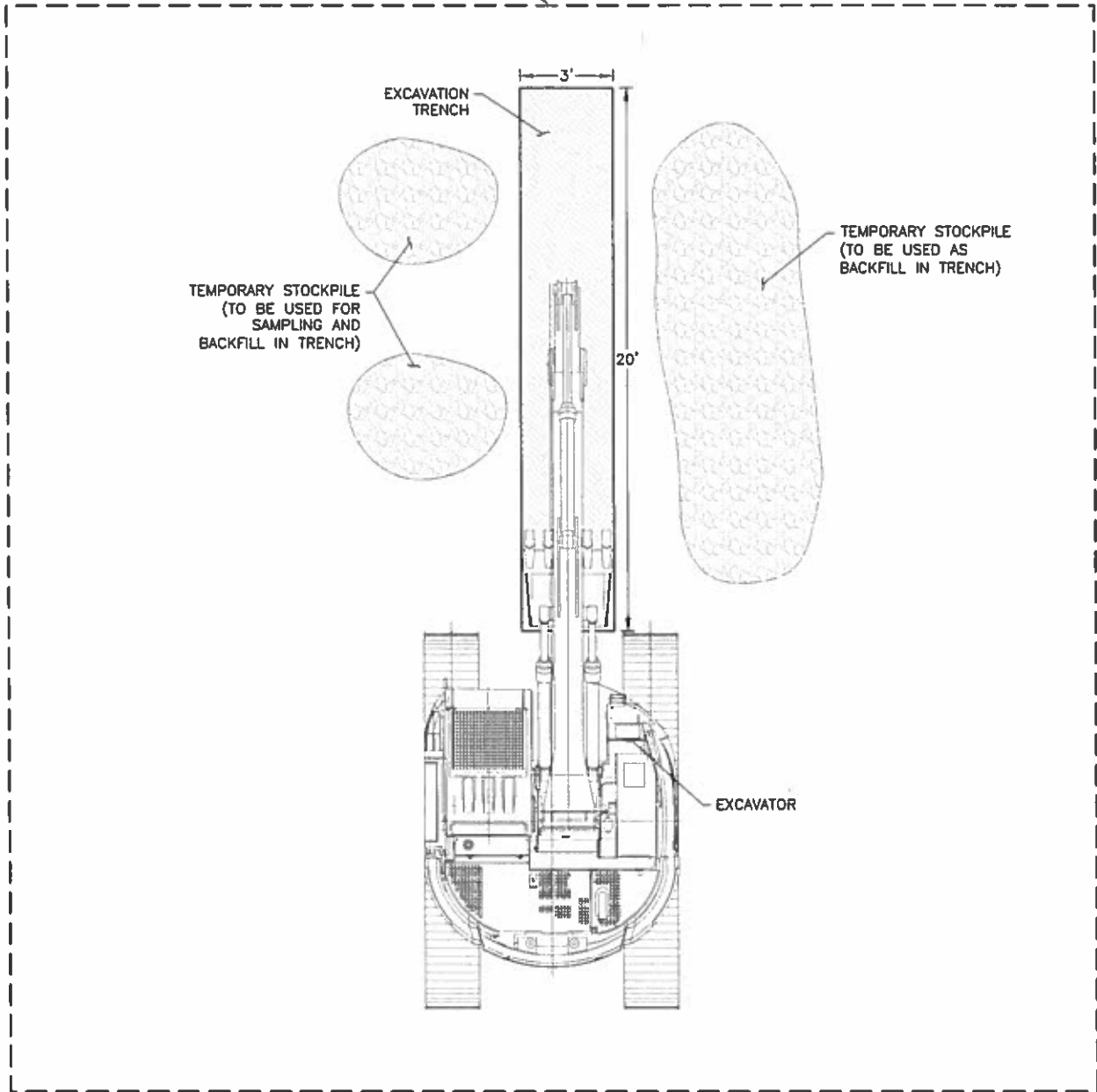
Appendix 1

Figure and Drill Site/Test Pit/Trenching Schematic





TEST PIT PAD DISTURBANCE AREA 30'X30'
BORE HOLE PAD DISTURBANCE AREA 40'X100'



P:\Projects\Montana Projects\350.0373.005 Rhyolite Ridge TradeOff and Geotech\A-CAD\FIGS\350.0373.005F17.dwg 9/3/2018 12:17 PM

NewFields

CLIENT

PARADIGM MINERALS
USA CORPORATION

PROJECT

RHYOLITE RIDGE MINE

TITLE

TEST PIT AND BORE HOLE EXCAVATION
LAYOUT AND DISTURBANCE AREA

FILENAME

350.0373.005F17

FIGURE NO.

2

REVISION

A

Appendix 2

Reclamation Cost Estimate

**Closure Cost Estimate
Property Information**

Enter Data Below in Green and Blue Spaces

STANDARDIZED RECLAMATION COST ESTIMATOR

Version 1.4.1

Build 017b (revised to work with Excel 2016 - 24 Oct 2016)

Approved for use in Nevada, August 1, 2012

COST DATA FILE INFORMATION

File Name: 3843I.Rhyolite Ridge Notice.RCE.V2.xlsm

Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm

Cost Data Date: August 1, 2018

Cost Data Basis: User Data Data Cost Units: Imperial

Author/Source: Nevada Division of Environmental Protection (NDEP) & NV BLM

PROJECT INFORMATION

Property/Mine Name: Rhyolite Ridge Exploration Project Property Code:

Project Name: Rhyolite Ridge Exploration Project

Date of Submittal: September 2018 Average Altitude: 5000 ft.

Select One: ☒ Notice or Sm Exploration Plan ☐ Lg Exploration Plan ☐ Mine Operation

Select One: ☒ Private Land ☐ Public or Public/Private

Cost Estimate Type: Surety

Cost Basis Category: S. Nevada Notice Level

Clark, Esmeralda, Lincoln and Nye Counties

Cost Basis Description:

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**Closure Cost Estimate
Cost Summary**

Project Name: Rhyolite Ridge Exploration Project
Project Date: September 2018
Model Version: Version 1.4.1
File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm

A. Earthwork/Recontouring	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Exploration	\$2,218	\$2,973	\$12	\$5,203
Exploration Roads & Drill Pads	\$1,248	\$1,932	\$0	\$3,180
Roads	\$0	\$0	\$0	\$0
Well Abandonment	\$383	\$132	\$3	\$518
Pits	\$0	\$0	N/A	\$0
Quarries & Borrow Areas	\$0	\$0	\$0	\$0
Underground Openings	\$0	\$0	\$0	\$0
Process Ponds	\$0	\$0	\$0	\$0
Heaps	\$0	\$0	\$0	\$0
Waste Rock Dumps	\$0	\$0	\$0	\$0
Landfills	\$0	\$0	\$0	\$0
Tailings	\$0	\$0	\$0	\$0
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Yards, Etc.	\$0	\$0	\$0	\$0
Drainage & Sediment Control	\$0	\$0	\$0	\$0
Generic Material Hauling	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal	\$3,849	\$5,037	\$15	\$8,901
Mob/Demob if included in Other User sheet	\$0	\$0	\$0	\$0
Mob/Demob	\$5,454	\$5,454		\$10,908
Subtotal "A"	\$9,303	\$10,491	\$15	\$19,809
B. Revegetation/Stabilization	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Exploration	\$100	\$38	\$73	\$211
Exploration Roads & Drill Pads	\$468	\$178	\$1,547	\$2,193
Roads	\$0	\$0	\$0	\$0
Well Abandonment	\$0	\$0	\$0	N/A
Pits	\$0	\$0	\$0	\$0
Quarries & Borrow Areas	\$0	\$0	\$0	\$0
Underground Openings	\$0	\$0	\$0	N/A
Process Ponds	\$0	\$0	\$0	\$0
Heaps	\$0	\$0	\$0	\$0
Waste Rock Dumps	\$0	\$0	\$0	\$0
Landfills	\$0	\$0	\$0	\$0
Tailings	\$0	\$0	\$0	\$0
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Yards, Etc.	\$0	\$0	\$0	\$0
Drainage & Sediment Control	\$0	\$0	\$0	\$0
Generic Material Hauling	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "B"	\$568	\$216	\$1,620	\$2,404
C. Detoxification/Water Treatment/Disposal of Wastes**	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Process Ponds/Sudge				\$0
Heaps				\$0
Dumps (Waste & Landfill)				\$0
Tailings				\$0
Surplus Water Disposal				\$0
Monitoring				\$0
Miscellaneous				\$0
Solid Waste - On Site	\$0	\$0	N/A	\$0
Solid Waste - Off Site				\$0
Hazardous Materials				\$0
Hydrocarbon Contaminated Soils	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "C"	\$0	\$0	\$0	\$0
D. Structure, Equipment and Facility Removal, and Misc.	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Other Demolition	\$0	\$0	\$0	\$0
Equipment Removal	\$0	\$0	\$0	\$0
Fence Removal	\$0	\$0	\$0	\$0
Fence Installation	\$0	\$0	\$0	\$0
Culvert Removal	\$0	\$0	N/A	\$0
Pipe Removal	\$0	\$0	N/A	\$0
Powerline Removal	\$0			\$0
Transformer Removal	\$0			\$0
Rip-rap, rock lining, gabions	\$0	\$0	\$0	\$0
Other Misc. Costs	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "D"	\$0	\$0	\$0	\$0
E. Monitoring	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Reclamation Monitoring and Maintenance	\$4,145	\$502	\$162	\$4,809
Ground and Surface Water Monitoring	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Subtotal "E"	\$4,145	\$502	\$162	\$4,809
F. Construction Management & Support	Labor	Equipment ⁽²⁾	Materials	Total
Construction Management	\$0	\$0	N/A	\$0
Construction Support	\$0	\$0	\$0	\$0
Road Maintenance	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "F"	\$0	\$0	\$0	\$0
Subtotal Operational & Maintenance Costs	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials ⁽²⁾	Total
Subtotal A through F	\$14,016	\$11,209	\$1,797	\$27,022

** Other Operator supplied costs - additional documentation required.

**Closure Cost Estimate
Cost Summary**

**Project Name: Rhyolite Ridge Exploration Project
Project Date: September 2018
Model Version: Version 1.4.1
File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm**

Indirect Costs		Include?	Total
1. Engineering, Design and Construction (ED&C) Plan (7)			N/A
2. Contingency (8)			N/A
3. Insurance (9)	\$210		\$210
4. Performance Bond (10)			N/A
5. Contractor Profit (11)			\$2,700
6. Contract Administration (12)			\$2,700
7. Government Indirect Cost (13)			\$567
Subtotal Add-On Costs			\$6,181
Total Indirect Costs as % of Direct Cost			23%
GRAND TOTAL			\$33,203

Administrative Cost Rates (%)		Cost Ranges for Indirect Cost Percentages			
		<=	<=	<=	>
1. Engineering, Design and Construction (ED&C) Plan (7)		\$1,000,000	\$25,000,000	\$25,000,000	Small Plan
Variable Rate		8%	6%	4%	0%
2. Contingency (8)		\$500,000	\$5,000,000	\$50,000,000	Small Plan
Variable Rate		10%	8%	6%	0%
3. Insurance (9)		1.5% of labor costs			
4. Bond (10)		3.0% of the O&M costs if O&M costs are >\$100,000			
5. Contractor Profit (11)		10% of the O&M costs			
6. Contract Administration (12)		\$1,000,000	\$25,000,000	\$25,000,000	
Variable Rate		10%	8%	6%	
Government Indirect Cost (13)		21% of contract administration			

RECLAMATION COST ESTIMATION SUMMARY SHEET FOOTNOTES

1. Federal construction contracts require Davis-Bacon wage rates for contracts over \$2,000. Wage rate estimates may include base pay, payroll loading.
2. The reclamation cost estimate must include the estimated plugging cost of at least one drill hole for each active drill rig in the project area. Where the
3. Miscellaneous items should be itemized on accompanying worksheets.
4. Fluid management should be calculated only when mineral processing activities are involved. Fluid management represents the costs of maintaining
5. Handling of hazardous materials includes the cost of decontaminating, neutralizing, disposing, treating and/or isolating all hazardous materials used.
6. Any mitigation measures required in the Plan of Operations must be included in the reclamation cost estimate. Mitigation may include measures to avoid.
7. Engineering, design and construction (ED&C) plans are often necessary to provide details on the reclamation needed to contract for the required work. To
8. A contingency cost is included in the reclamation cost estimation to cover unforeseen cost elements. Calculate the contingency cost as a percentage of the
9. Insurance premiums are calculated at 1.5% of the total labor costs. Enter the premium amount if liability insurance is not included in the itemized unit
10. Federal construction contracts exceeding \$100,000 require both a performance and a payment bond (Miller Act, 40 USC 2701et seq.). Each bond premium
11. For Federal construction contracts, use 10% of estimated O&M cost for the contractor's profit.
12. To estimate the contract administration cost, use 6 to 10% of the operational and maintenance (O&M) cost. Calculate the contract administration cost as a
13. Government indirect cost rate is 21% of the contract administration costs.

**Closure Cost Estimate
Exploration**

Project Name: Rhyolite Ridge Exploration Project- Notice of Exploration
 Date of Submittal: September 2018
 File Name: 3843LRhyolite Ridge Notice.RCE.V2.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Sid_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration - Cost Summary			
	Labour	Equipment	Materials
Hole Abandonment Costs	\$383	\$132	\$172
Trench Backfilling Costs	\$1835	\$2,841	\$4,016
Trench Revegetation Costs	\$2,218	\$4,973	\$12
TOTALS	\$2,318	\$5,011	\$4,016

Exploration Drillhole Abandonment - User Input									
Hole Plugging									
Description (required)	ID Code	Hole Type (select)	Diameter in	Total Number of Holes	Max Holes Open at One Time	Casing to Remove ft	Average Depth of Hole (ft)	Depth to Water ft	Hole Plug Method (select)
1 Shallow Borehole Drilling		Rotary	8.0	13.0	1.0	0.0	100.0	100.0	Grout + Backfill

Notes:
 1. Core holes are pre-drilled, use length of hole below pre-drilled length
 2. If Top Plug is used, assume minimum 12hr labor time to place plug and backfill with cuttings/slud (including move-to-sit up time)
 Geotechnical boreholes will be drilled to a maximum depth of 100 feet; therefore, 100 feet is included to maintain a conservative abandonment estimate.

Exploration Trenches - User Input									
Trench Parameters									
Description (required)	ID Code	Trench Length ft	Trench Depth ft	Trench Bottom Width ft	Trench Slope Angle degrees	Additional Hrs for Work-in ft	Backfill Material (select)	Backfill Material Type (select)	Revegetation
1 Test Pit Excavations (24" 24-foot long trenches)		400	20.0	3.0	95.0	1.0	1	Aluminum	Seed Mix, Mulch, Fertilizer (select)

Notes:
 1. Include pre-cast/ hours necessary to walk equipment in from drop-off point to work area
 2. Material Types are used for density correction based on material densities in Caterpillar Performance Handbook material density table
 Trench length = 24' 20 feet
 Trenches will have a maximum depth of 20 feet.

Exploration Drillhole Abandonment									
Description (required)	Volume of depth ft ³	Hole Plugging Material (ft ³)	Total Grout Volume ft ³	Total Cuttings Volume ft ³	Total Top Soil Volume ft ³	Total Drilling Abandonment Hours (ft ³)	Casing Removal Labor Cost (\$)	Casing Removal Equipment Cost (\$)	Total Cost (\$)
1 Shallow Borehole Drilling	0.356	0.00	0.39	0.39	0.32	3	\$0	\$0	\$527

Notes:
 1. Assumes grout backfill from bottom of hole to 50' (15.24m) above static water level, up to 10' (3m) from top of hole
 2. Assumes 25% loss to formation for grout backfill
 3. If Top Plug method is used, assume physical plug installed without backfill, grout or cement. Not available option for Nevada projects
 4. If Top Plug method is used, assume physical plug installed without backfill, grout or cement. Not available option for Nevada projects
 5. Assumes that (a) casing is not cemented around length, (b) does not include temporary surface casing
 6. Assumes minimum 1 hr per hole for abandonment (excluding move-to and casing removal)
 7. Assumes fixed hours per hole for setup & tear-down and moving between holes (see Productivity Sheet) per drill hole (includes rig time if grouting required, labor crew only & cuttings backfill only)

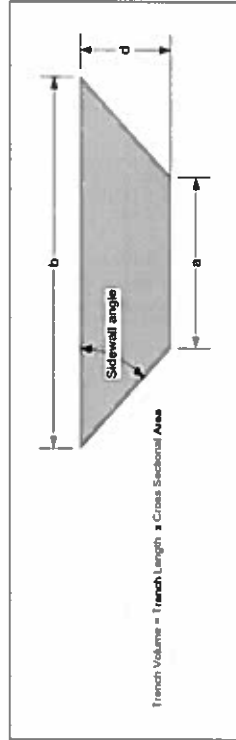
Closure Cost Estimate
Exploration

Project Name: Rhyolite Ridge Exploration Project- Notice or Exploration
 Date of Submittal: September 2018
 File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Sld_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration - Cost Summary				
	Labor	Equipment	Materials	Totals
Hole Abandonment Costs	\$1,835	\$2,841	\$12	\$4,676
Trench Backfilling Costs	\$2,318	\$2,873	\$12	\$5,203
Trench Revegetation Costs	\$100	\$38	\$73	\$211
TOTALS	\$2,318	\$3,011	\$95	\$5,414

Exploration Trenches - Calculations

Exploration Trench Volume Calculation



Dozing & Ripping/Scarifying Calculations

Dozing: Dozing distance = 1/2 trench length or 400 ft (max push) whichever is less
 Assumes full push (grade correction factor = 1)

Revegetation: 18 ft added to trench width to account for revegetation under spoil pile

Exploration Trenches - Backfill/Regrading Costs

Productivity = Dozer Productivity x Grade Correction x Density Correction x Material x Visibility x Job Efficiency (0.83)

Description (Required)	Trench Backfill Volume	Dozer Push Distance	Equipment Productivity	Dozing Material	Density Correction	Backfilling Feet	Corrected Hourly Productivity	Total Dozer Hours	Trench Backfill Labor Cost	Trench Backfill Equipment Cost	Total Trench Backfill Cost
1 Test PH Excavations (24) 20-foot long trenches	2,196	240	104	1.00	0.79	DGR	90	25	\$1,835	\$2,841	\$4,676
	2,196										

Exploration Trenches - Revegetation Costs

Description (Required)	Surface Area	Revegetation Labor Cost	Revegetation Equipment Cost	Revegetation Material Cost	Total Revegetation Cost
1 Test PH Excavations (24) 20-foot long trenches	0.20	\$100	\$38	\$73	\$211
	0.20	\$100	\$38	\$73	\$211

Closure Cost Estimate Expl. Roads & Pads

Project Name: Rhyolite Ridge Exploration Project- Notice of Exploration
Date of Submittal: September 2018
File Name: 39431.Rhyolite Ridge Notice.RCE.V2.xlsm
Model Version: Version 1.4.1
Cost Data: User Data
Cost Data File: SRCE_Cost_Data_File_1_12_Sid_2018.xlsm
Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary			
	Labor	Equipment	Materials
Grading Costs	\$1,241	\$1,932	N/A
Cover Placement Cost	\$0	\$0	N/A
Ripping/Scarifying Cost	\$0	\$0	N/A
Subsoil Earthworks	\$1,241	\$1,932	
Revegetation Cost	\$453	\$178	\$1,547
TOTALS	\$1,716	\$2,110	\$1,547

Physical (1) - MANDATORY													
You must fill in ALL green cells and relevant blue cells in this section for each road													
Exploration Roads & Pads - User Input													
Facility Description													
Description (required)													
ID Code	Underlying Grade Slope % grade	Undergrade Slope % IV	Cut Slope degrees	Pad + Drill Pad Length ft	Road Width ft	Number of Drill Pads	Individual Sump Volume Cy	Drill Pad Width ft	Drill Pad Length ft	Slope Replacement Percent %	Regrade Volume (if calculated elsewhere) cu yds	Disturbed Area (if calculated elsewhere) sq ft	Growth Media Thickness ft
Growth Media													
Distance to Road to Stockpile % of mile													
1	Planned Drill Sites (including RWI Sites)	10.0	1.3	35.0	1,300	12	52	50.0	100	100%			
2	Planned Test Pit Working Area	10.0	1.3	35.0	770	24	6	30.0	30	100%			
3	Planned Overland Travel	0.0	0.0	0.0	15,100	0	0	0.0	0	0%			

- Notes:
1. All Physical parameters must be input even if manual overrides for volume or area are used.
 2. Slope replacement refers to the percentage of cut volume replaced during regrading.
 3. If Slope from facility to borrow source is >20° downhill travel time may be underestimated due to limitation of uphill travel time curves and downhill speed tables (see Productivity Sheet)
 4. Sump volume will be applied to all roads on slopes <20°. On slopes >20% pad width (ft or cut volume) should be adequate to account for sump volume

Physical (1) - MANDATORY													
You must fill in ALL green cells and relevant blue cells in this section for each road													
Exploration Roads & Pads - User Input (cont.)													
Facility Description													
Description (required)													
Regrade Material Consideration (select)	Cut Material Type (select)	Recontouring Equipment First (select)	Additional Hrs for Walk-in (1)	Growth Media Material Type (select)	Placement Equipment First (select)	Maximum Foot Size (select)	Additional Hrs for Walk-in (1)	Seed lbs (select)	Mulch (select)	Fertilizer (select)	Scarifying/Ripping? (select)	Rapting Plant (select)	
1	LS - broken	Small Dozer	1.0					Mix 3	None	None	No		
2	LS - broken	Small Dozer	1.0					Mix 3	None	None	No		
3	Planned Overland Travel							Mix 3	None	None	No		

- Notes:
1. Include operator hours necessary to walk equipment in from drop-off point to work area
 2. Material Types are used for density correction based on material densities in Caterpillar Performance Handbook material density table

Closure Cost Estimate
Expl. Roads & Pads

Project Name: Rhyolite Ridge Exploration Project- Notice or Exploration
Date of Submittal: September 2018
File Name: 38431Rhyolite Ridge Notice.RCE.V2.xlsm
Model Version: Version 1.4.1
Cost Data: User Data
Cost Data File: SRCE_Cost_Data_File_1_12_Sid_2018.xlsm
Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary			
	Labor	Equipment	Materials
Grading Costs	\$1,248	\$1,932	N/A
Cover Placement Cost	\$0	\$0	N/A
Ripping/Scarifying Cost	\$0	\$0	N/A
Subtotal Earthworks	\$1,248	\$1,932	N/A
Revegetation Cost	\$468	\$176	\$1,547
TOTALS	\$1,716	\$2,108	\$1,547
			\$5,373

Exploration Roads & Pads - Calculations

Regrading Volume and Footprint Volume

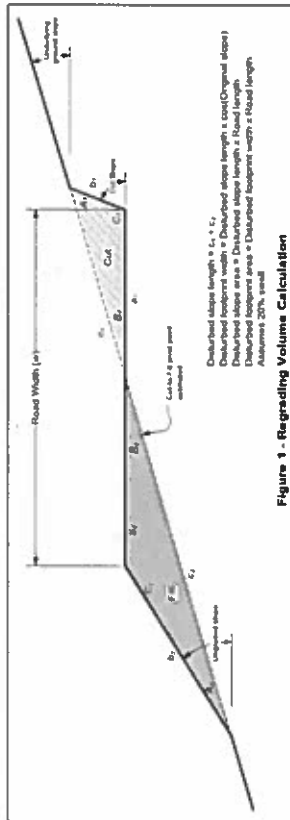


Figure 1 - Regrading Volume Calculation

Will not allow dozer for slopes greater than 30%
For dozer regrading push distance = road width
Assumes dozer push is uphill
Assumes minimum push distance of 100 ft

Swell Factor: 1.2

Ripping/Scarifying Calculations

Minimum 1 hr ripping/scarifying time per area
Number of passes = Free slope length x Grader width
Travel distance = Number of passes x Road length
Total hours = (Travel distance x Grader productivity) ÷ (Number of passes x Grader maneuver time)
For dozer regrading assumes push distance = 3 x road width

Revegetation Calculations

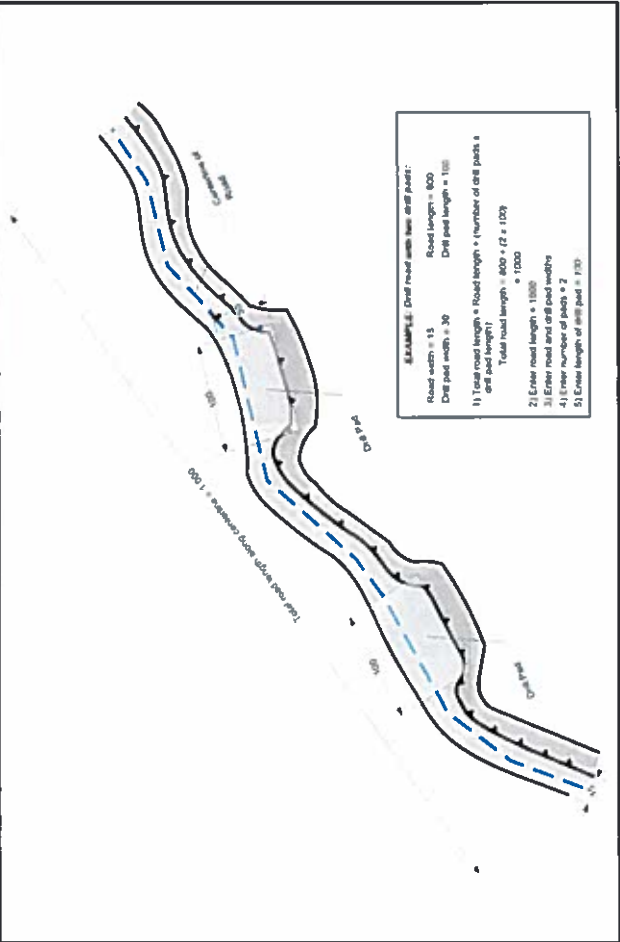
Minimum of 1 acre crane time per area

Closure Cost Estimate
Expl. Roads & Pads

Project Name: Rhyolite Ridge Exploration Project- Notice of Exploration
Date of Submittal: September 2018
File Name: 38431Rhyolite Ridge Notice.RCE.V2.xlsm
Model Version: Version 1.4.1
Cost Data: User Data
Cost Data File: SRCE_Cost_Data_File_1_12_Sld_2018.xlsm
Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary			
	Labor	Equipment	Materials
Grading Costs	\$1,248	\$1,932	N/A
Cover Placement Cost	\$0	\$0	N/A
Paving/Sealing Cost	\$0	\$0	N/A
Subtotal Earthworks	\$1,248	\$1,932	\$0
Hangoff/Rein Cost	\$468	\$178	\$1,547
TOTALS	\$1,716	\$2,110	\$1,547
			\$5,373

Inputting Exploration Roads and Drill Pads



**Closure Cost Estimate
Expl. Roads & Pads**

Project Name: Rhynollite Ridge Exploration Project- Notice or Exploration
Date of Submission: September 2018
File Name: 36431Rhynollite Ridge Notice.RCE.V2.stsm
Model Version: Version 1.4.1
Cost Data: User Data
Cost Data File: SRCE_Cost_Data_File_1_12_Stid_2018.stsm
Cost Estimate Type: Surety
Cost Basis: S. Nevada Notice Level

Exploitation Roads & Pads - Cost Summary				
	Labor	Equipment	Materials	Total
Grading Costs	\$1,248	\$1,932	N/A	\$3,180
Cover Placement Cost	\$0	\$0	N/A	\$0
Riprap/Scarifying Cost	\$0	\$0	N/A	\$0
Subtotal Earthworks	\$1,248	\$1,932	\$0	\$3,180
Revegetation Cost	\$468	\$170	\$1,547	\$2,185
TOTALS	\$1,716	\$2,102	\$1,547	\$5,373

Exploration Roads & Pads - Regrading Costs

	Description (frequency)	Total Pit Length ft	Total Days to Fill hr	Regrading Volume cy	Reinforcing Steel lb	Equipment Productivity hr/cy	Total Equipment Hours ¹⁰ hr	Total Labor Cost \$	Total Event Cost \$	Total Ramping Cost \$
1	Planned Drill Sites (including MW Site)	0	1,200	2,382	DGR	93	13	\$354	\$1,477	\$2,431
2	Planned Pit Working Area	0	720	360	DGR	93	4	\$294	\$456	\$749
3	Planned Overland Travel	15,000	0			Material Type		\$0	\$0	
		15,000	1,920	2,762			17	\$1,248	\$1,932	\$3,180

(||) Includes walk-in time based on distance and travel speed (see Productivity sheet (or speeds))

Exploration, Roads & Pads - Growth Media Costs

	Description (required)	Growth Media Volume cuy	Growth Media Replacement Flt	Fleet Productivity LLT/HP	Number of Trucks/ Scrapers	Total Fleet Hours	Total Labor Cost \$	Total Equipment Cost \$	Total Growth Media Cost \$
1	Planned Over Sites (including MW Site)						\$0	\$0	\$0
2	Planned Test Pit Working Area						\$0	\$0	\$0
3	Planned Overland Travel						\$0	\$0	\$0
4							\$0	\$0	\$0
5							\$0	\$0	\$0
6							\$0	\$0	\$0
7							\$0	\$0	\$0
8							\$0	\$0	\$0
9							\$0	\$0	\$0
10							\$0	\$0	\$0
11							\$0	\$0	\$0
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68							\$0	\$0	\$0
69							\$0	\$0	\$0
70							\$0	\$0	\$0
71							\$0	\$0	\$0
72							\$0	\$0	\$0

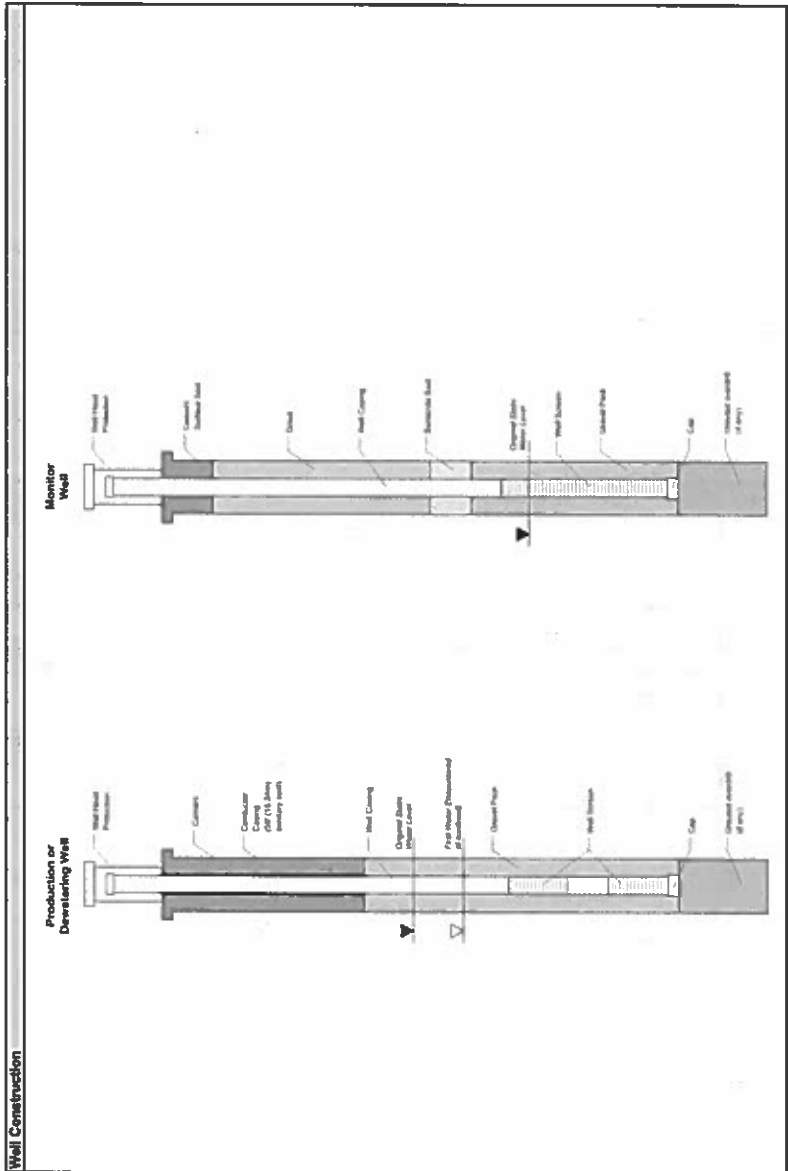
Exploration Roads & Pads - Scarifying/Revegetation Costs

[illegible]

Closure Cost Estimate
Well Abandonment

Project Name: Rhyolite Ridge Exploration Project- Notice of Exploration
Date of Submission: September 2018
File Name: 38433.Rhyolite Ridge Notice.RCEV2-Item
Model Version: Version 1.4.1
Cost Data: User Data
Cost Data File: SRCE_Cost_Data_File_1_12_2018_Item
Cost Estimate Type: Surety Cost Basis: S Nevada Notice Level

Well Abandonment			
Production Unabandoned	Labor	Equipment	Materials
Monitoring Wells	10	10	10
	\$385	\$175	\$5
TOTALS	\$385	\$175	\$5



Closure Cost Estimate Monitoring

Project Name: Rhyolite Ridge Exploration Project- Notice or Exploration

Date of Submittal: September 2018

File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm

Model Version: Version 1.4.1

Cost Data: User Data

Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm

Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Reclamation Monitoring & Maintenance - Cost Summary				
	Labor	Equipment	Lab & Materials	Totals
Revegetation Maintenance	\$45	\$17	\$162	\$224
Erosion Maintenance	\$0	\$0	N/A	\$0
Reclamation Monitoring	\$4,100	\$485	N/A	\$4,585
Subtotal Reclamation Monitoring	\$4,145	\$502	\$162	\$4,809
Water Quality Monitoring	\$0	\$0	\$0	\$0
TOTAL MONITORING	\$4,145	\$502	\$162	\$4,809

Reclamation Maintenance								
Description	Total Vegetation Surface Area (1,2) acres	% Area Requiring Reseeding	Seed Mix (select)	Area Requiring Reseeding acres	Seed \$/acres	Labor \$/acres	Equipment \$/acres	Totals \$
Revegetation Maintenance	4	10%	Mix 3	0.4	\$363.00	\$100.00	\$38.00	
Labor								\$45
Equipment								\$17
Materials								\$162
Cost/Acre								\$501
							Subtotal	\$224

Notes: 1) Surface area is NOT the same as footprint disturbance area typically used for permitting purposes.

	Total Volume Growth Media cy	% Volume Requiring Maintenance	Average Growth Media Placement Cost \$/CY	Volume Requiring Replacement cy		Labor (assume: 25%) \$/acres	Equipment (assume: 75%) \$/acres	Total \$
Erosion Maintenance	0		\$0.00	0		\$0.00	\$0.00	\$0

Notes:

Reclamation Monitoring					
Description	Hrs/Day	Days/Year	Number of Years	Rate \$/hr	
Field Work					
Field Geologist/Engineer				\$149.49	\$0
Range Scientist	6	1	3	\$136.68	\$2,460
Reporting					
Field Geologist/Engineer				\$149.49	\$0
Range Scientist	4	1	3	\$136.68	\$1,640
					Subtotal \$4,100
Travel					
	Hrs/Trip	Trips/Year	Years	Truck Cost \$/hr	
Travel	6	1	3	\$26.97	\$485
					Subtotal \$485
Total Reclamation Monitoring					\$4,585

Notes:

**Closure Cost Estimate
Labor Rates**

Project Name: Rhyolite Ridge Exploration Project- Notice or Exploration
 Date of Submittal: September 2018
 File Name: 3843LRhyolite Ridge Notice.RCE.V2.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Sld_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Color Code Key	
User Input - Direct Input	Direct Input
User Input - Pull Down List	Pull Down Selection
Program Constant (can override)	Alternate Input
Program Calculated Value	Locked Cell - Formula or Reference

ZONE ADJUSTMENTS

Cost Basis/Project Region	S. Nevada Notice Level	Clark, Esmeralda, Lincoln and Nye Counties
Power Equipment Operators	>49 miles	\$3.50
Truck Drivers	>79 miles	\$3.50
Laborers	>59 miles	\$3.25

INDIRECT COSTS

Unemployment (%)	3.00%
Retirement/SS/Medicare (%)	7.65%
Workman's Compensation (%)	0.07%

Other Indirects

State Payroll Tax (13,15,17)	
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Total Other Indirects	8.80%
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HOURLY LABOR RATE TABLE

EQUIPMENT TYPE (1) OR JOB DESCRIPTION	Labor Group	Base Rate (\$/hr)	Zone Adjustment (\$/hr)	Hourly Wage (\$/hr)	Fringe (\$/hr)	Retirement/Medicare (\$/hr)	Unemployment Insurance (\$/hr)	Workman's Compensation (\$/hr)	Other Indirect Costs (\$/hr)	Total (\$/hr)
Equipment Operators (\$/hr) (2)										
Bulldozers										
D6R	Group 6	\$54.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D6R w/ Winch					\$0.00					
D7R	Group 6	\$54.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D8R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D9R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D11R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D11R	Group 6	\$54.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
Wheeled Dozers										
B24G					\$0.00					
B34G					\$0.00					
B44					\$0.00					
B54G					\$0.00					
Motor Graders										
129H	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
149H	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
189H	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
24M					\$0.00					
Track Excavators										
312C	Group 12	\$58.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
320C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
325C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
330C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
345H	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
365BL					\$0.00					
385H	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
Scrapers										
631G	Group 18	\$59.23	\$3.50	\$62.73	\$0.00	\$1.88	\$4.80	\$4.70	\$0.00	\$74.12
637G	Group 18	\$59.23	\$3.50	\$62.73	\$0.00	\$1.88	\$4.80	\$4.70	\$0.00	\$74.12
Wheeled Loaders										
924G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
928G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
950G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
955G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
972G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
980G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
985G	Group 12	\$59.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
990					\$0.00					
992G	Group 12	\$59.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
994D					\$0.00					
L2750					\$0.00					
Shovels										
PC2000					\$0.00					
PC3000					\$0.00					
PC4000					\$0.00					
PC3500					\$0.00					
PC3000					\$0.00					
Hydraulic Hammers										
H-120 (fts 325)										
H-160 (fts 345)										
H-180 (fts 365/385)										
Demolition Shears										
S340 (fts 372/375/330)										
S365 (fts 330/345)										
S390 (fts 365/385)										
Demolition Grapples										
G315 (fts 322/323)										
G325 (fts 325/330)										
G330 (fts 345/365)										

**Closure Cost Estimate
Labor Rates**

Project Name: Rhyolite Ridge Exploration Project- Notice of Exploration
 Date of Submittal: September 2018
 File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Color Code Key	
User Input - Direct Input	Direct Input
User Input - Pull Down List	Pull Down Selection
Program Constant (can override)	Alternate Input
Program Calculated Value	Locked Cell - Formula or Reference

ZONE ADJUSTMENTS			
Cost Basis Project Region	S. Nevada Notice Level	Clark, Esmeralda, Lincoln and Nye Counties	
Power Equipment Operators	>50 miles	\$3.50	
Truck Drivers	>70 miles	\$3.50	
Laborers	>50 miles	\$3.25	
INDIRECT COSTS			
Unemployment (%)	3.00%		
Retirement/SS/Medicare (%)	7.85%		
Workman's Compensation (%)	0.075		
Other Indirects			
State Payroll Tax (13% (15% (17%))			
Total Other Indirects	8.89%		

HOURLY LABOR RATE TABLE										
Other Equipment										
420D 4WD Backhoe	Group 4	\$58.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00	\$73.13
428D 4WD Backhoe	Group 4	\$58.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00	\$73.13
C5533E Vibratory Roller	Group 4	\$58.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00	\$73.13
C5633E Vibratory Roller					\$0.00					
CP533E Sheepfoot Compactor					\$0.00					
CP633E Sheepfoot Compactor					\$0.00					
Light Truck - 1.5 Ton					\$0.00					
Supervisor's Truck					\$0.00					
Flatbed Truck					\$0.00					
Air Compressor - 300cf	Group 1	\$55.67	\$3.50	\$59.17	\$0.00	\$1.78	\$4.53	\$4.44	\$0.00	\$69.91
Welding Equipment	Group 8	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
Heavy Duty Drill Rig	Group 2	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.80	\$4.51	\$0.00	\$71.03
Pump (plugging) Drill Rig	Group 2	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.80	\$4.51	\$0.00	\$71.03
Concrete Pump					\$0.00					
Gas Engine Vibrator	Group 8	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
Generator 8KW					\$0.00					
HDEP Walker (pipe or liner)					\$0.00					
5 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
20 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
50 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
120 Ton Crane					\$0.00					
Truck Drivers (\$/hr) (4)										
725	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
730	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
735	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
740	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
769D	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
773E					\$0.00					
777D	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
785C					\$0.00					
793C					\$0.00					
797B					\$0.00					
613E (1,000 gal) Water Wagon	Group 3	\$48.44	\$3.50	\$49.94	\$0.00	\$1.50	\$3.82	\$3.75	\$0.00	\$59.00
621E (8,000 gal) Water Wagon	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
777D Water Truck					\$0.00					
785C Water Truck					\$0.00					
Dump Truck (10-12 yd ³)	Group 2	\$48.73	\$3.50	\$49.73	\$0.00	\$1.49	\$3.80	\$3.73	\$0.00	\$58.76
NOTES:										
(1) Equipment Type	Caterpillar model or equivalent 1eTourneau									
(2) Equipment Operator Source	D-8 NV1800/A 8/10/2018									
(3) Zone Basis	From Las Vegas City Hall									
(4) Truck Driver Source	D-8 NV1800/3401/05/2018									
(5) Zone Basis	From Las Vegas City Hall									

2018 MOB/DEMOB using R.S. MEANS and SRCE equipment and DAVIS-BACON wages										
blue font is for project specific user input										
Miles from Washoe County Courthouse to project, one way								300		
Miles from equipment rental yard to project, one way (9)								283		
PMU - Rhyolite Ridge Notice - September 2018, Mob from Las Vegas, NV								Hours travel time @ 55 MPH	5.15	
Equipment	Mobilization \$/hour (1)	\$ Flat rate load & unload (2)	\$/hour Deadhead (empty return cost) (3)	Disassembly and assembly (4)	Permit cost \$ (5)	Pilot car costs	# of units	One Way Mob Cost	Total Mob and Demob Cost	
Bulldozers										
D6R	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -	1	\$ 1,113	\$ 2,225	
D7R	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 466	1	\$ 1,933	\$ 3,866	
D8R	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -	
D9R	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -	
D10R	\$ 150	\$ 150	\$ 150	\$ 65,940	\$ 25	\$ 974		\$ -	\$ -	
D11R (two transports) (7)	\$ 150	\$ 150	\$ 150	\$ 139,848	\$ 25	\$ 649		\$ -	\$ -	
Motor Graders										
14GH	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
16GH	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 325		\$ -	\$ -	
Track Excavators										
320C	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -	
325C	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -	
345B	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -	
385BL	\$ 150	\$ 150	\$ 150	\$ 46,260	\$ 25	\$ 649		\$ -	\$ -	
Scrapers										
831G	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -	
837G PP	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -	
Wheeled Loaders										
928G	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
966G	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
972G	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -	
988G	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 325		\$ -	\$ -	
992G (two transports) (7)	\$ 150	\$ 150	\$ 150	\$ 76,440	\$ 25	\$ 649		\$ -	\$ -	
Hydraulic Hammers										
H-120 (fits 325) no charge, mobilize with mac	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
H-160 (fits 345) no charge, mobilize with mac	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
H-180 (fits 365/385) no charge, mobilize with	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Other Equipment										
420D 4WD Backhoe	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
CS563E Vibratory Roller	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
Light Truck - 1.5 Ton	\$ 63	\$ 63	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Supervisor's Truck	\$ 56	\$ 56	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Air Compressor + tools	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
Welding Equipment	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
Heavy Duty Drill Rig	\$ 392	\$ 392	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Pump (plugging) Drill Rig	\$ 392	\$ 392	\$ -	\$ -	\$ -	\$ -	1	\$ 2,408	\$ 4,816	
Concrete Pump	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
Gas Engine Vibrator	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
Generator 5KW	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
HDEP Welder (pipe or liner)	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
5 Ton Crane Truck	\$ 94	\$ 94	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
25 Ton Crane	\$ 135	\$ 135	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Trucks										
725	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
740	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 325		\$ -	\$ -	
769D	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 649		\$ -	\$ -	
777D (two transports) (8)	\$ 150	\$ 150	\$ 150	\$ 73,452	\$ 25	\$ 974		\$ -	\$ -	
613E (5,000 gal) Water Wagon	\$ 150	\$ 150	\$ 150	\$ -	\$ -	\$ -		\$ -	\$ -	
621E (8,000 gal) Water Wagon	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -	
Dump Truck (10-12 yd ³)	\$ 112	\$ 112	\$ 112	\$ -	\$ -	\$ -		\$ -	\$ -	
Miscellaneous										
Equipment for dry hole abandonment (420D 4WD)	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
Pilot car (Light Truck)	\$ 56	\$ 56	\$ 56	\$ -	\$ -	\$ -		\$ -	\$ -	
Truck Tractor + Lowbed Trailer 75 ton	\$ 150	\$ 150	\$ 150	\$ -	\$ -	\$ -		\$ -	\$ -	
Truck Tractor + Flatbed Trailer 40 ton	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -	
Light Truck + Flatbed Trailer 25 ton	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
								3	\$ 10,908	
Footnotes and explanations of assumptions										
(1) The sum of the cost of equipment from either the SRCE or RSM equipment tab plus Davis-Bacon labor tab										
(2) Assumes minimum of 30 minutes load and secure and 30 minutes unsecure and unload machine.										
(3) No "Deadhead" (empty) charge for Mob up to 50 miles. More than 50 miles the cost of deadhead same rate as loaded miles.										
(4) Only large equipment requires disassembly for transport. Includes cost of mechanic + mechanic's truck + crane operator + crane.										
(5) Nevada Dept. of Transportation oversized permits are \$25 per trip or \$60 per year.										
(6) Sum of mobilization plus all ancillary costs for one way loaded and return empty.										
(7) Two transports are required but the second transport does not need pilot cars or permits or a heavy duty trailer.										
(8) Two transports required with both requiring full complement of pilot cars and permits.										
(9) For large mining operations, mobilization may be required from more than one location. For example, the Elko yard may not have four 631 scrapers. Additional equipment may need to mobilize from Reno, Las Vegas, or Salt Lake City. Input the further distance here.										
(10) Pilot Car costs based on SRCE light truck costs and Davis-Bacon wages										
(11) SRCE costs based on July 2018 vendor quotes.										
(12) RS Means costs based on R.S. Means Heavy Construction Cost Data, 2018 Q2										
(13) Davis Bacon wages based on 2018 determination.										

ATTACHMENT B



September 21, 2018

RECEIVED-MAILROOM

2018 SEP 24 P 1:05

BUREAU OF LAND MANAGEMENT
TONOPAH FIELD OFFICE

via Federal Express (773298930176)

Mr. Timothy Coward
Bureau of Land Management
Tonopah Field Office
P.O. Box 911 (1553 South Main Street)
Tonopah, Nevada 89049-0911

RE: Paradigm Minerals USA Corp., Rhyolite Ridge Exploration Project – New Notice,
Esmeralda County, Nevada

Dear Mr. Coward:

On behalf of Paradigm Minerals USA, Corp. (PMU), EM Strategies, Inc. (EM Strategies) is submitting a full replacement to the Notice for exploration activities planned at the Rhyolite Ridge Exploration Project (Project) originally submitted on August 28, 2018. The Notice has been revised to adjust locations of planned surface disturbance in order to avoid impacting cultural resources. Emily Whorton, EM Strategies' Cultural Program Manager, will be in touch with the Bureau of Land Management Tonopah Field Office Archaeologist regarding required monitoring during Notice activities. Please provide EM Strategies with a courtesy copy of all correspondence for the Project. If you have any questions or need additional information, please contact our office at (775) 753-9496.

Sincerely,

EM Strategies, Inc.

A handwritten signature in blue ink, appearing to read "K Sweet", written over a horizontal line.

Kaitlin C. Sweet
Elko Manager

Enclosure

cc: Mr. Matt Weaver - PMU (w/enclosure via email: mweaver@globalgeo.com.au)



Notice**Rhyolite Ridge Exploration Project**

September 21, 2018

Paradigm Minerals USA Corp. (PMU) intends to conduct exploration activities at the Rhyolite Ridge Exploration Project (Project) located in Sections 19, 20, 28, 29, and 32, Township 1 South, Range 37 East (T1S, R37E), Mount Diablo Base and Meridian in Esmeralda County, Nevada (Project Area). PMU plans to drill bore holes, drill and install a ground water monitoring/piezometer well, and conduct test pit excavations, accessed by existing roads and planned overland travel routes. The locations of planned exploration activities are shown on Figure 1, Appendix 1. Planned surface disturbance under the Notice totals **3.96 acres**. PMU files this Notice pursuant to the provisions of 43 Code of Federal Regulations (CFR) 3809.300.

1. Name of Operator: Paradigm Minerals USA Corp.

Name of Corporate Contact: Matt Weaver, Senior Vice President

Mailing Address: Paradigm Minerals USA Corp.
241 Ridge Street, Suite 210
Reno, Nevada 89501

Tax Identification Number:

Owners of Mining Claims: Paradigm Minerals Arizona Corp
241 Ridge Street, Suite 210
Reno, Nevada 89501

2. Bureau of Land Management (BLM) Serial Numbers and Names of Claims on Which Disturbance will Occur:

Claim Name	NMC #
SLM 15	NMC1171550
SLM 17	NMC1171552
SLM 19	NMC1171554
SLM 28	NMC1171563
SLM 30	NMC1171565
SLM 32	NMC1171567
SLM 34	NMC1171569
SLM 53	NMC1171588
SLM 55	NMC1171590
SLM 57	NMC1171592
SLM 58	NMC1171593
SLM 60	NMC1171595
SLM 62	NMC1171597

Claim Name	NMC #
SLM 64	NMC1171599
SLM 69	NMC1171604
SLM 7	NMC1171542
SLM 74	NMC1171609
SLM 87	NMC1171622
SLM 88	NMC1171623
SLM 89	NMC1171624
SLM 90	NMC1171625
SLM 91	NMC1171626
SLM 92	NMC1171627
SLM 93	NMC1171628
SLM 94	NMC1171629

3. Location of Proposed Activities: The Project is located approximately 40 air miles west-southwest from Tonopah (Figure 1) and can be reached from Tonopah by traveling west 34 miles on United States Highway 6, then turning south onto State Highway 265 and traveling 21 miles, just past the town of Silver Peak. Turn west onto Coyote Road and travel another 17 miles until reaching the Project Area. The Project Area is located on the Rhyolite Ridge SW 7 ½ minute United States Geological Survey (USGS) Quadrangle map. The location is shown on Figure 1, Appendix 1.
4. Existing Disturbance in the Project Area: There are several existing tracks and trails located within the Project Area, as shown on Figure 1.
5. Project Description: PMU plans to conduct exploration drilling at the Project from up to 11 constructed drill sites, one ground water monitoring/piezometer well site, and 24 test pit excavations accessed via existing roads and planned overland travel routes. Drill sites (including the well site) will be constructed with an average working area of 100 feet long by 50 feet wide. Sumps approximately 20 feet long by ten feet wide by 6.75 feet deep will be excavated within site disturbance to collect drill cuttings and manage fluids. Only two of the 11 planned boring locations and the ground water monitoring/piezometer well are anticipated to require the use of sumps. The ground water monitoring well will be completed with four-inch diameter steel casing up to 360 feet deep. The test pits will be excavated within working areas with the dimensions of 30 feet long by 30 feet wide. The test pits will be excavated with the approximate dimensions of 20 feet long by three feet wide and up to ten feet deep. Approximately 15,100 linear feet of overland travel routes will be utilized with an approximate disturbance width of six feet (undisturbed ground between the tracks not included). PMU has justified that the overland travel width of six feet is practical as the geotechnical explorations (test pits and non-well boreholes) will only be accessed once and will be backfilled and abandoned immediately upon completion. PMU's planned exploration activities are shown on Figure 1.

The planned well will be drilled to a depth of 360 feet using a reverse-circulation (RC) rig. The geotechnical holes will be completed with a rotary drill to a maximum depth of 100 feet. Hollow-stem augers will be used to advance the boring through overburden and diamond core drilling will be used to advance the borings in rock. Water for the Project will be obtained by a private contractor. The drill crew and geologists will use 4-wheel drive vehicles to access the site. Support vehicles and equipment for the exploration drilling activities include pick-up trucks, pipe trucks, and water trucks.

The depth to the water table in the areas of proposed drilling is unknown; however, for the bond calculation assumptions, 100 feet below ground surface is assumed for reclamation and hole abandonment estimations.

6. Approximate Surface Disturbance: The following specifics apply to the Project:

Planned Surface Disturbance

- Twenty-four test pit excavation areas with the approximate dimensions of 30 feet long by 30 feet wide = **0.50 acre**;

- Twelve drill sites (including the well site) constructed with the approximate dimensions of 100 feet long by 50 feet wide = **1.38 acres**; and
- Approximately 15,100 linear feet of overland travel routes with a running width (disturbance of two tracks) of six feet = **2.08 acres**.

Total Planned Surface Disturbance = 3.96 acres.

7. Schedule of Activities: PMU anticipates that Project activities will commence in September 2018. Reclamation activities will likely be completed in the Summer of 2020; however, revegetation activities are limited by the time of year during which they can be effectively implemented. Site conditions or yearly climatic variations may require that this schedule be modified to achieve revegetation success. Once a site or road is no longer needed for exploration, the site will be reclaimed.
8. Measures Taken to Prevent Unnecessary or Undue Degradation: Operations will be conducted consistent with 43 CFR 3809.415 and 3809.420.
 - Existing access routes and overland travel routes will be used.
 - Only nontoxic fluids will be used in the drilling process.
 - PMU will not knowingly disturb, alter, injure, or destroy any scientifically important paleontological deposits; or any historical or archaeological site, structure, building, or object. If PMU discovers any cultural or paleontological resource that might be altered or destroyed by operations, the discovery will be left intact and reported to the authorized BLM officer.
 - Any survey monuments, witness corners, or reference monuments will be protected to the extent economically and technically feasible.
 - Public safety will be maintained throughout the life of the Project. All equipment will be maintained in a safe and orderly manner.
 - All solid wastes will be removed from the Project Area and disposed of in a state, federal, or local designated site.
 - Hazardous substances utilized at the Project will include diesel fuel, gasoline, and lubricating grease. Approximately 100 gallons of diesel fuel and gasoline will be stored in fuel delivery systems on the drill rig and support vehicles. Approximately 50 pounds of lubricating grease will be stored on the drill rig or transported by drill trucks. In the event that hazardous or regulated materials were spilled, measures will be taken to control the spill and the BLM and the Nevada Division of Environmental Protection (NDEP) will be notified as required. Any hazardous substance spills will be cleaned immediately and any resulting waste will be transferred off site in accordance with all applicable local, state, and federal regulations. Contract drillers will maintain spill kits on site for use in case of a spill.

- PMU will comply with all applicable state and federal fire laws and regulations and all reasonable measures will be taken to prevent and suppress fires in the Project Area.
 - Best Management Practices (BMPs) for sediment control will be utilized during construction, operation, and reclamation to minimize sedimentation from disturbed areas. Sumps could include, but not be limited to, fabric or certified weed-free straw bale filter fences, siltation or filter berms, and downgradient drainage channels in order to prevent unnecessary or undue degradation to the environment.
 - All drill holes will be abandoned in accordance with the State of Nevada Regulations for Water Well and Related Drilling (Nevada Administrative Code [NAC]/Nevada Revised Statutes [NRS] Chapter 534), specifically per NAC 534.4371.
 - All reasonable steps will be taken to minimize the introduction of noxious weeds and to limit the spread of any existing infestations.
9. Reclamation: Reclamation will be completed to the standards described in 43 CFR 3809.420. Exploration drill sites will be regraded to the natural contour and slope of the surrounding topography and to the pre-Project condition. All spoil piles from sediment trap construction will be stockpiled at drill site locations and recontoured at such time as the drill site will no longer be used. Test pit excavations will be backfilled once the samples are collected. All earthwork will be completed with a Caterpillar Backhoe, or equivalent equipment. Overland travel will be ripped and seeded. Reclamation of the piezometer/ground water monitoring well will be cutting the casing to ground surface, plugging the drill hole with cement, and reclaiming the typical-sized drill pad and sump. The regraded and/or ripped areas will then be seeded with a BLM-approved seed mix, at the appropriate time of year for optimum seed sprouting and plant growth. The seeding will be completed with a manual broadcaster and raked. The reclaimed surfaces will be left in a textured or rough condition (small humps, pits, etc.). The broadcast seed application rate will vary based on the shrub, forb, and grass species selected. Native seed will be used when available. Only certified weed-free seed will be used for reclamation seeding. Post-reclamation maintenance will consist of remedial dirt work and reseeding, if required.
- Site monitoring for stability and revegetation success will be conducted on an annual basis, during the spring or fall, or until attainment of the revegetation standards established in the *Nevada Guidelines for Successful Revegetation for the Nevada Division of Environmental Protection, the Bureau of Land Management, and the USDA Forest Service* (Instruction Memorandum #NV 99-013).
10. Reclamation Cost Estimate: The reclamation cost estimate (Appendix 2), as required by 43 CFR 3809.552, is attached to this Notice. The Standardized Reclamation Cost Estimator, Version 1.4.1, Build 017b including 2018 cost data, with the 2018 Mobilization/Demobilization worksheet was used to estimate reclamation costs for the Project.

The following assumptions have been made in calculating the reclamation cost estimate:

- Twelve constructed drill sites approximately at 100 feet long by 50 feet wide will be recontoured, ripped, and seeded.
- Twenty-four test pits with the approximate excavation dimensions of 20 feet long by three feet wide and 20 feet deep (maximum) will be backfilled. The larger test pit working areas with the approximate dimensions of 30 feet long by 30 feet wide will be recontoured and seeded.
- Abandonment of one ground water monitoring well with a casing diameter of four inches and average depth of 360 feet.
- Approximately 15,100 linear feet of overland travel routes with a running width (disturbance of two tracks only) of six feet will be ripped and seeded.
- A Caterpillar Backhoe, or equivalent equipment, will be used for all reclamation earthwork including recontouring and scarifying sumps. The disturbed area will be seeded by a manual broadcast method and raked.
- The total estimated reclamation cost for the total planned disturbance contained in this Notice is **\$33,203.00**.

RHYOLITE RIDGE EXPLORATION PROJECT
ESMERALDA COUNTY, NEVADA

PARADIGM MINERALS USA CORP.
NOTICE

11. Signature Page

Paradigm Minerals USA Corp.

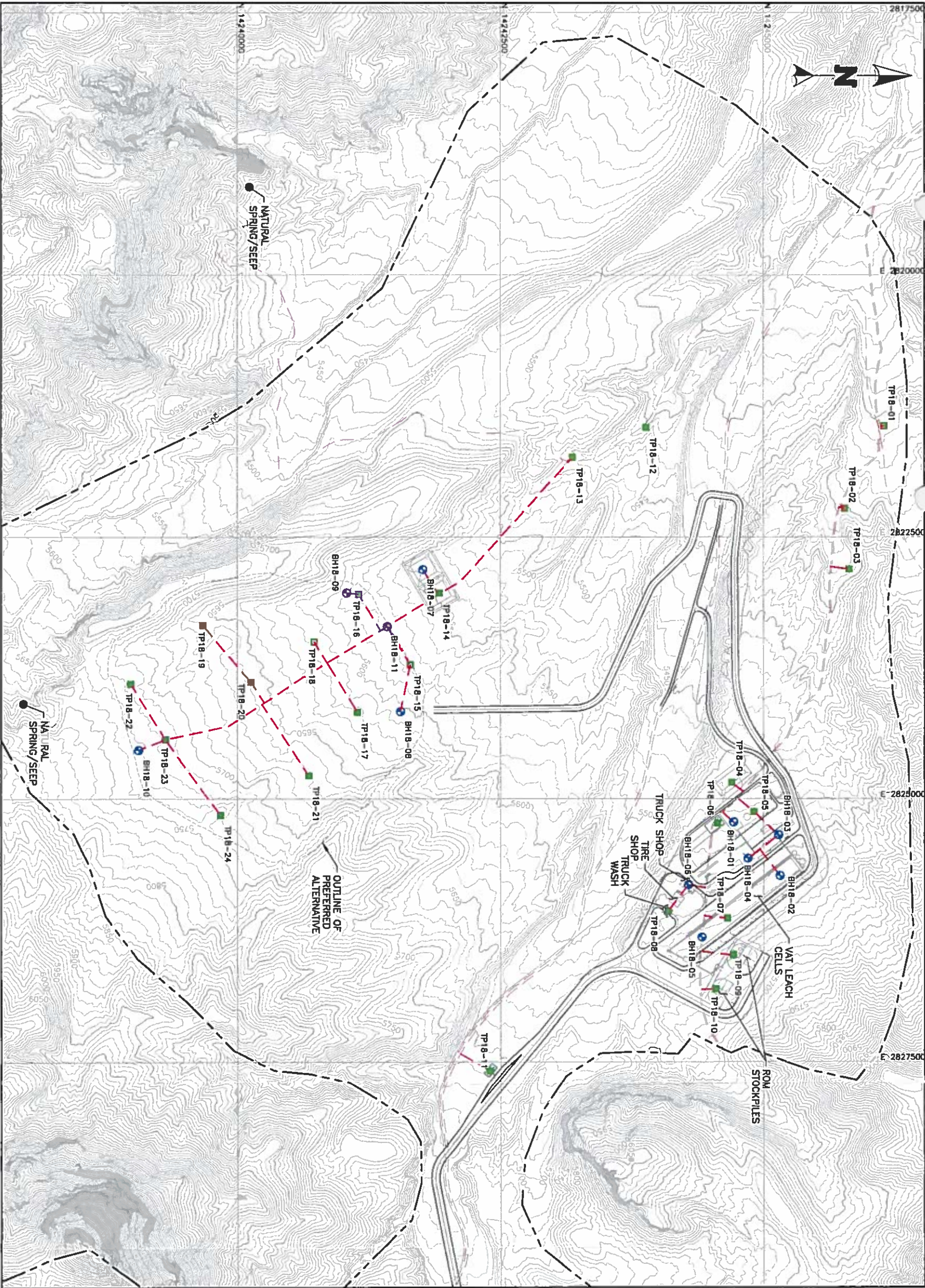
By 
Matt Weaver, Senior Vice President

Date September 21, 2018

Appendix 1

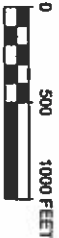
Figure and Drill Site/Test Pit/Trenching Schematic

P:\Projects\Montana Projects\350.0373.005 Rhyolite Ridge Trade-Off and Geotech\A-CAD\FIGS\350.0373.005 F2-rev2.dwg-8/22/2018 3:59 PM



LEGEND:

- EXISTING GROUND CONTOURS
- EXISTING ROADS/TRAILS
- PROJECT BOUNDARY
- GEOTECHNICAL SITE ACCESS ROAD




DESCRIPTION OF DISTURBANCE		DIMENSION OF DISTURBANCE	PUBLIC LAND (ACRES)
GEOTECHNICAL TEST PITS		(24) 30 FEET BY 30 FEET	0.50
GEOTECHNICAL BORE HOLES		(11) 40 FEET BY 100 FEET	1.01
GEOTECHNICAL SITE ACCESS ROADS		6 FEET WIDE BY 14,000 FEET	1.93
TOTAL			3.44

PROPOSED TEST PIT LOCATIONS		
POINT	NORTHING	EASTING
TP18-01	14,246,148.11	2,821,436.90
TP18-02	14,245,773.18	2,822,227.23
TP18-03	14,245,815.36	2,822,806.50
TP18-04	14,244,687.15	2,824,840.55
TP18-05	14,244,909.94	2,825,125.54
TP18-06	14,244,564.12	2,825,237.14
TP18-07	14,244,655.25	2,826,135.40
TP18-08	14,244,092.02	2,826,069.45
TP18-09	14,244,710.48	2,826,492.49
TP18-10	14,244,545.12	2,826,811.94
TP18-11	14,242,400.94	2,827,588.96
TP18-12	14,243,882.75	2,821,452.59
TP18-13	14,243,184.06	2,821,738.74
TP18-14	14,241,919.30	2,823,035.70
TP18-15	14,241,642.89	2,823,715.68
TP18-16	14,241,151.94	2,823,049.10
TP18-17	14,241,141.90	2,824,170.92
TP18-18	14,240,730.37	2,823,497.69
TP18-19	14,239,673.47	2,823,341.12
TP18-20	14,240,128.39	2,823,882.80
TP18-21	14,240,678.90	2,824,772.85
TP18-22	14,238,988.20	2,823,900.08
TP18-23	14,239,316.44	2,824,430.24
TP18-24	14,239,840.47	2,825,156.32

PROPOSED BOREHOLE LOCATIONS			
POINT	NORTHING	EASTING	DEPTH
BH18-01	14,244,715.42	2,825,228.66	25.00
BH18-02	14,245,154.87	2,825,735.34	40.00
BH18-03	14,245,142.47	2,825,350.46	40.00
BH18-04	14,244,850.44	2,825,568.87	25.00
BH18-05	14,244,410.98	2,826,317.99	40.00
BH18-06	14,244,283.11	2,825,821.49	40.00
BH18-07	14,241,764.00	2,822,810.11	40.00
BH18-08	14,241,549.57	2,824,164.93	40.00
BH18-09	14,241,038.18	2,823,036.42	40.00
BH18-10	14,239,061.97	2,824,529.15	100.00
BH18-11	14,241,419.24	2,823,348.44	100.00

DRAFT



CLIENT

PARADIGM MINERALS
USA CORPORATION

PROJECT

RYHOLITE RIDGE MINE TRADE-OFF STUDY

TITLE

GEOTECHNICAL INVESTIGATION

FILENAME

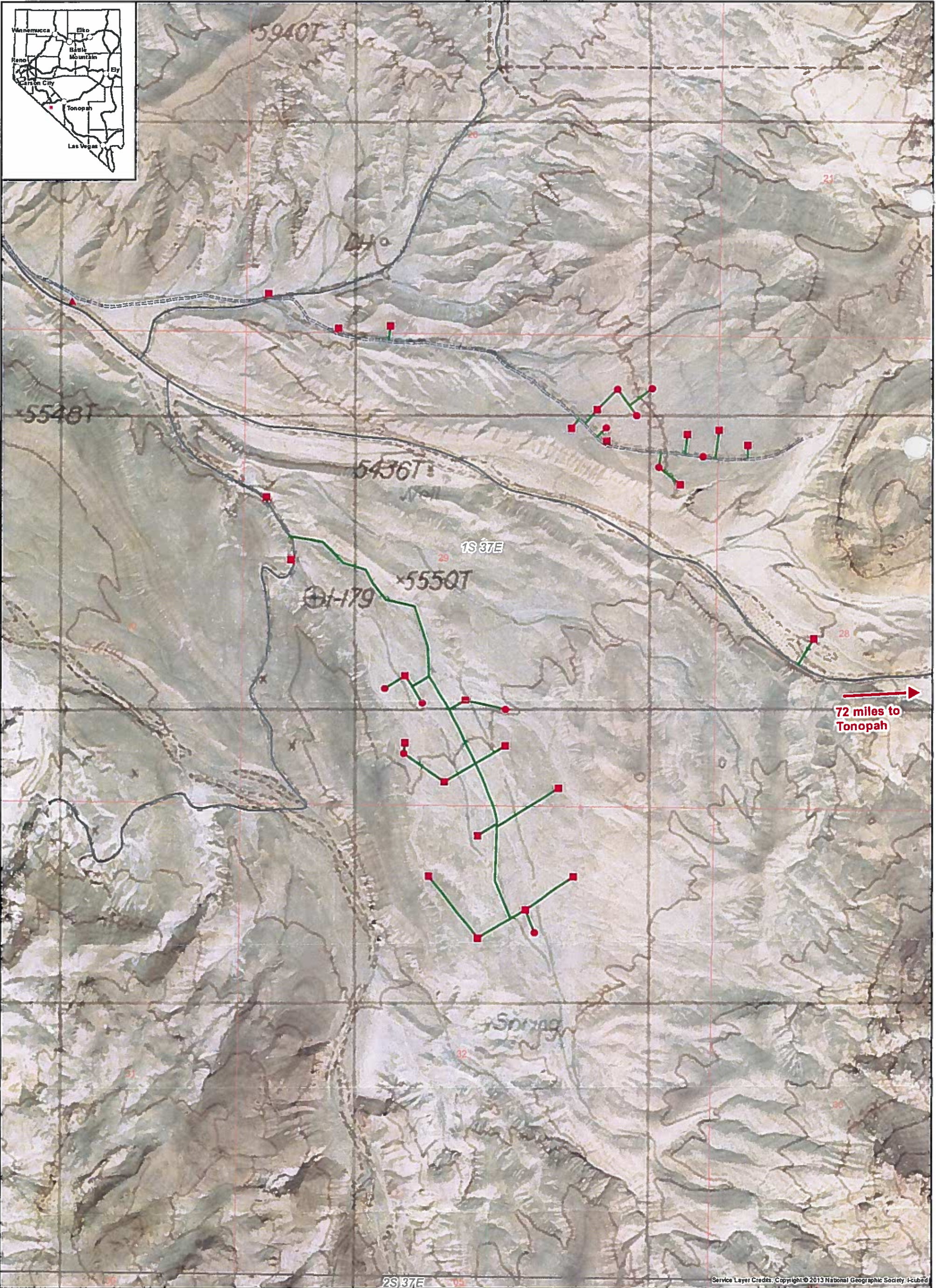
350.0373.005 F2-rev2

FIGURE NO.

1

REVISION

2



Explanation

- Existing Road
- - - Existing Jeep Trail

Planned

- Test Pit (24)
- Bore Hole (11)
- ▲ Ground Water Monitoring Well (1)
- Overland Travel (15,100 feet)

Land Status: All BLM

PARADIGM MINERALS USA CORP

RHYOLITE RIDGE NOTICE

Project Location
and Planned Activities

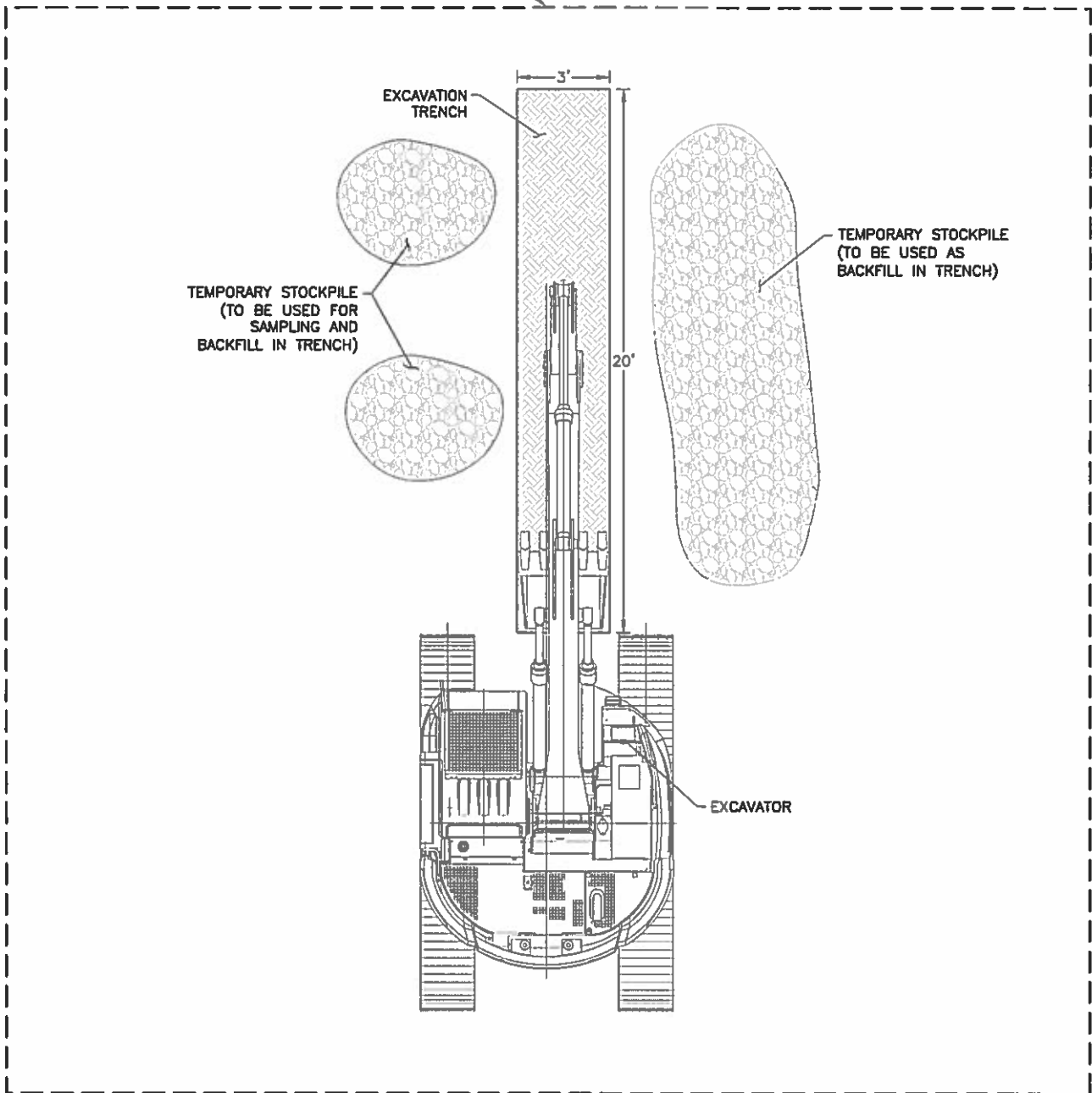
Figure 1

Date: 09/21/2018 Drawn By: W01
Revised: Project No: 3843
Base Map: USGS 7.5' quad: Rhyolite Ridge SW
File Name: 3843W_RhyoliteRidge_Notice.mxd




0 1,000 2,000 Feet

TEST PIT PAD DISTURBANCE AREA 30'X30'
BORE HOLE PAD DISTURBANCE AREA 40'X100'



P:\Projects\Montana Projects\350.0373.005 Rhyolite Ridge TradeOff and Geotech\A-CAD\FIGS\350.0373.005F17.dwg-8/3/2018 12:17 PM

		CLIENT	PARADIGM MINERALS USA CORPORATION	
PROJECT		RHYOLITE RIDGE MINE		
TITLE		TEST PIT AND BORE HOLE EXCAVATION LAYOUT AND DISTURBANCE AREA		FILENAME 350.0373.005F17
		FIGURE NO.	2	REVISION A

Appendix 2

Reclamation Cost Estimate

**Closure Cost Estimate
Property Information**

Enter Data Below in Green and Blue Spaces

STANDARDIZED RECLAMATION COST ESTIMATOR

Version 1.4.1

Build 017b (revised to work with Excel 2016 - 24 Oct 2016)

Approved for use in Nevada, August 1, 2012

COST DATA FILE INFORMATION	
File Name:	3843I.Rhyolite Ridge Notice.RCE.V2.xlsm
Cost Data File:	SRCE_Cost_Data_File_1_12_Std_2018.xlsm
Cost Data Date:	August 1, 2018
Cost Data Basis:	User Data Data Cost Units: Imperial
Author/Source:	Nevada Division of Environmental Protection (NDEP) & NV BLM
PROJECT INFORMATION	
Property/Mine Name:	Rhyolite Ridge Exploration Project Property Code:
Project Name:	Rhyolite Ridge Exploration Project
Date of Submittal:	September 2018 Average Altitude: 5000 ft.
Select One:	<input checked="" type="radio"/> Notice or Sm Exploration Plan <input type="radio"/> Lg Exploration Plan <input type="radio"/> Mine Operation
Select One:	<input checked="" type="radio"/> Private Land <input type="radio"/> Public or Public/Private
Cost Estimate Type:	Surety
Cost Basis Category:	S. Nevada Notice Level
Clark, Esmeralda, Lincoln and Nye Counties	
Cost Basis Description:	

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**Document Estimate
Cost Summary**

Project Name: Rhyolite Ridge Exploration Project
Project Date: September 2018
Model Version: Version 1.4.1
File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm

A. Earthwork/Recontouring	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Exploration	\$2,218	\$2,073	\$12	\$5,203
Exploration Roads & Drill Pads	\$1,248	\$1,932	\$0	\$3,180
Roads	\$0	\$0	\$0	\$0
Well Abandonment	\$383	\$132	\$3	\$518
Pits	\$0	\$0	N/A	\$0
Quarries & Borrow Areas	\$0	\$0	\$0	\$0
Underground Openings	\$0	\$0	\$0	\$0
Process Ponds	\$0	\$0	\$0	\$0
Heaps	\$0	\$0	\$0	\$0
Waste Rock Dumps	\$0	\$0	\$0	\$0
Landfills	\$0	\$0	\$0	\$0
Tailings	\$0	\$0	\$0	\$0
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Yards, Etc.	\$0	\$0	\$0	\$0
Drainage & Sediment Control	\$0	\$0	\$0	\$0
Generic Material Hauling	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal	\$3,849	\$5,037	\$15	\$8,901
Mob/Demob If Included in Other User sheet	\$0	\$0	\$0	\$0
Mob/Demob	\$5,454	\$5,454		\$10,908
Subtotal "A"	\$9,303	\$10,491	\$15	\$19,809
B. Revegetation/Stabilization	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Exploration	\$100	\$38	\$73	\$211
Exploration Roads & Drill Pads	\$468	\$178	\$1,547	\$2,193
Roads	\$0	\$0	\$0	\$0
Well Abandonment				N/A
Pits	\$0	\$0	\$0	\$0
Quarries & Borrow Areas	\$0	\$0	\$0	\$0
Underground Openings				N/A
Process Ponds	\$0	\$0	\$0	\$0
Heaps	\$0	\$0	\$0	\$0
Waste Rock Dumps	\$0	\$0	\$0	\$0
Landfills	\$0	\$0	\$0	\$0
Tailings	\$0	\$0	\$0	\$0
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Yards, Etc.	\$0	\$0	\$0	\$0
Drainage & Sediment Control	\$0	\$0	\$0	\$0
Generic Material Hauling	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "B"	\$568	\$216	\$1,620	\$2,404
C. Detoxification/Water Treatment/Disposal of Wastes**	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Process Ponds/Sludge				\$0
Heaps				\$0
Dumps (Waste & Landfill)				\$0
Tailings				\$0
Surplus Water Disposal				\$0
Monitoring				\$0
Miscellaneous				\$0
Solid Waste - On Site	\$0	\$0	N/A	\$0
Solid Waste - Off Site				\$0
Hazardous Materials				\$0
Hydrocarbon Contaminated Soils	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "C"	\$0	\$0	\$0	\$0
D. Structure, Equipment and Facility Removal, and Misc.	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Other Demolition	\$0	\$0	\$0	\$0
Equipment Removal	\$0	\$0	\$0	\$0
Fence Removal	\$0	\$0	\$0	\$0
Fence Installation	\$0	\$0	\$0	\$0
Culvert Removal	\$0	\$0	N/A	\$0
Pipe Removal	\$0	\$0	N/A	\$0
Powerline Removal	\$0			\$0
Transformer Removal	\$0			\$0
Rip-rap, rock lining, gabions	\$0	\$0	\$0	\$0
Other Misc. Costs	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "D"	\$0	\$0	\$0	\$0
E. Monitoring	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Reclamation Monitoring and Maintenance	\$4,145	\$502	\$162	\$4,809
Ground and Surface Water Monitoring	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Subtotal "E"	\$4,145	\$502	\$162	\$4,809
F. Construction Management & Support	Labor	Equipment ⁽²⁾	Materials	Total
Construction Management	\$0	\$0	N/A	\$0
Construction Support	\$0	\$0	\$0	\$0
Road Maintenance	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "F"	\$0	\$0	\$0	\$0
Subtotal Operational & Maintenance Costs	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials ⁽³⁾	Total
Subtotal A through F	\$14,016	\$11,209	\$1,797	\$27,022

** Other Operator supplied costs - additional documentation required.

**Reclamation Cost Estimate
Cost Summary**

**Project Name: Rhyolite Ridge Exploration Project
Project Date: September 2018
Model Version: Version 1.4.1
File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm**

Indirect Costs		Include?	Total
1. Engineering, Design and Construction (ED&C) Plan (7)			N/A
2. Contingency (8)			N/A
3. Insurance (9)	\$210		\$210
4. Performance Bond (10)			N/A
5. Contractor Profit (11)			\$2,702
6. Contract Administration (12)			\$2,702
7. Government Indirect Cost (13)			\$567
Subtotal Add-On Costs			\$6,181
Total Indirect Costs as % of Direct Cost			23%
GRAND TOTAL			\$33,203

Administrative Cost Rates (%)					
		Cost Ranges for Indirect Cost Percentages			
		<=	<=	<=	>
1. Engineering, Design and Construction (ED&C) Plan (7)		\$1,000,000	\$25,000,000	\$25,000,000	Small Plan
	Variable Rate	8%	6%	4%	0%
2. Contingency (8)		\$500,000	\$5,000,000	\$50,000,000	Small Plan
	Variable Rate	10%	8%	6%	0%
3. Insurance (9)		1.5% of labor costs			
4. Bond (10)		3.0% of the O&M costs if O&M costs are >\$100,000			
5. Contractor Profit (11)		10% of the Q&M costs			
6. Contract Administration (12)		\$1,000,000	\$25,000,000	\$25,000,000	
	Variable Rate	10%	8%	6%	
Government Indirect Cost (13)		21% of contract administration			

RECLAMATION COST ESTIMATION SUMMARY SHEET FOOTNOTES

1. Federal construction contracts require Davis-Bacon wage rates for contracts over \$2,000. Wage rate estimates may include base pay, payroll loading.
2. The reclamation cost estimate must include the estimated plugging cost of at least one drill hole for each active drill rig in the project area. Where the
3. Miscellaneous items should be itemized on accompanying worksheets.
4. Fluid management should be calculated only when mineral processing activities are involved. Fluid management represents the costs of maintaining
5. Handling of hazardous materials includes the cost of decontaminating, neutralizing, disposing, treating and/or isolating all hazardous materials used.
6. Any mitigation measures required in the Plan of Operations must be included in the reclamation cost estimate. Mitigation may include measures to avoid,
7. Engineering, design and construction (ED&C) plans are often necessary to provide details on the reclamation needed to contract for the required work. To
8. A contingency cost is included in the reclamation cost estimation to cover unforeseen cost elements. Calculate the contingency cost as a percentage of the
9. Insurance premiums are calculated at 1.5% of the total labor costs. Enter the premium amount if liability insurance is not included in the itemized unit
10. Federal construction contracts exceeding \$100,000 require both a performance and a payment bond (Miller Act, 40 USC 270et seq.). Each bond premium
11. For Federal construction contracts, use 10% of estimated O&M cost for the contractor's profit.
12. To estimate the contract administration cost, use 6 to 10% of the operational and maintenance (O&M) cost. Calculate the contract administration cost as a
13. Government indirect cost rate is 21% of the contract administration costs.

Closure Cost Estimate
Exploration

Project Name: Rhyolite Ridge Exploration Project- Notice of Exploration
 Date of Submittal: September 2018
 File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE Cost_Data_File_1_12_Sld_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration - Cost Summary			
	Labor	Equipment	Materials
Hole Abandonment Costs	\$3,083	\$1,132	\$12
Trench Backfilling Costs	\$1,835	\$2,841	\$4,076
Subtotal Earthworks	\$2,218	\$2,841	\$12
Trench Revigation Costs	\$1,101	\$38	\$211
TOTALS	\$2,218	\$3,011	\$45

Exploration Drillhole Abandonment - User Input									
Facility Description									
	Description (required)	ID Code	Hole Type (select)	Diameter In	Total Number of Holes	Max Holes Open at One Time	Casing to Remove ft	Average Depth of Hole (1) ft bgs	Hole Plug Method (select)
1	Shallow Borehole Drilling		Rotary	8.0	11.8	1.0	0.0	100.0	Grout + Backfill

Notes:
 1. If core holes are pre-drilled, use length of hole below pre-drilled length.
 2. If Top Plug is selected, assumes maximum 1/2 hr laborer time to place plug and backfill with cuttings/seal (including move-to-set up time).
 Geotechnical boreholes will be drilled to a maximum depth of 100 feet; therefore, 100 feet is included to maintain a conservative abandonment estimate.

Exploration Trenches - User Input									
Facility Description									
	Description (required)	ID Code	Trench Length ft	Trench Depth ft	Trench Slope (degrees)	Additional Hrs for Wash (1) hr	Backfill Material (select)	Cut Material Type (select)	Revegetation
1	Top PM Excavations (24) 20-foot long trenches		400	20.0	2.0	0.0	1	Alternium	Small Dozer

Notes:
 1. Includes 30 minutes hours necessary to walk equipment in from drop-off point to work area.
 2. Material Types are used for density correction based on material densities in California Performance Handbook material density table.
 Trench length = 24' 20' feet.
 Trenches will have a maximum depth of 20 feet.

Exploration Drillhole Abandonment									
	Description (required)	Volume of Material (1) cu ft	Hole Plugging Material (1) cu ft	Total Grout Volume (2) cu ft	Total Casing Volume (3) cu ft	Total Top Seal Volume (3.1) cu ft	Total Drilling Abandon Hours (4) hrs	Casing Removal Labor Cost (5) \$	Casing Removal Equipment Cost (6) \$
1	Shallow Borehole Drilling	0.350	0.350	0.350	0.350	0.350	3	\$0	\$0

Notes:
 1. Assumes grout backfill from bottom of hole to 50' (15.24m) above static water level, up to 10' (3m) from top of hole.
 2. Assumes 25% discount for grout backfill.
 3. If "Top Plug" hole type is selected, physical plug installed without backfill, grout or cement. Not available option for Nevada projects.
 4. Assumes that all (8 m) of hole is plugged with cement if "Grout Only", "Backfill + Grout", or "Cement Plug" hole plug method are chosen.
 5. Assumes that all (8 m) of hole is plugged with cement if "Grout Only", "Backfill + Grout", or "Cement Plug" hole plug method are chosen.
 6. Assumes minimum 1 hr per hole for abandonment (including move-to and casing removal).
 7. Assumes (read hours per hole for setup & tear-down and moving between holes (see Productivity Sheet) per drill hole (includes rig time if grouting required, labor crew only if cuttings backfill only).

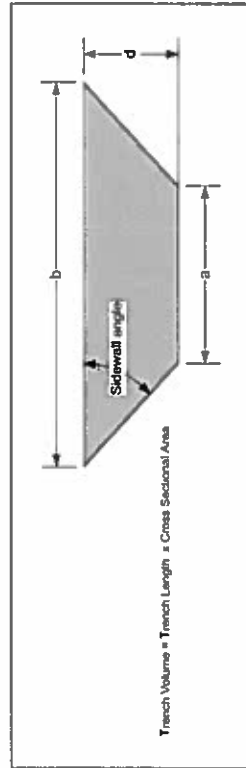
Closure Cost Estimate
Exploration

Project Name: Rhyolite Ridge Exploration Project- Notice or Exploration
 Date of Submittal: September 2018
 File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE Cost Data File 1 12 Std 2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S Nevada Notice Level

Exploration - Cost Summary				
	Labor	Equipment	Materials	Totals
How Abandonment Costs	\$383	\$132	\$12	\$527
Trench Backfilling Costs	\$1,835	\$2,841	\$4,616	\$4,616
Trench Revegetation Costs	\$2,218	\$2,873	\$12	\$5,203
TOTALS	\$100	\$38	\$73	\$211
	\$2,318	\$3,011	\$85	\$5,414

Exploration Trenches - Calculations

Exploration Trench Volume Calculation



Dozing & Ripping/Scarifying Calculations

Dozing: Dozing distance = 1/2 trench length or 400 ft (max push) whichever is less
 Assumes flat push (grade correction factor = 1)

Revegetation: 10 ft added to trench width to account for revegetation under spoil pile

Exploration Trenches - Backfill/Regrading Costs

Productivity = Dozer Productivity x Grade Correction x Density Correction x Operator (0.75) x Material x Visibility x Job Efficiency (0.83)

Description (required)	Trench Backfill Volume	Dozer Push Distance	Equipment Productivity	Dozing Material	Density Correction	Backfilling Fleet	Corrected Hourly Productivity	Total Dozer Hours	Trench Backfill Labor Cost	Trench Backfill Equipment Cost	Total Trench Backfill Cost
1. Test Pit Excavations (24) 20-foot long trenches	LCV (BCV x 30%) 2,196	240	184	1.00	0.79	DSR	90	25	\$1,335	\$2,141	\$4,876
									\$1,835	\$2,841	\$4,676

Exploration Trenches - Revegetation Costs

Description (required)	Surface Area	Revegetation Labor Cost	Revegetation Equipment Cost	Revegetation Material Cost	Total Revegetation Cost
1. Test Pit Excavations (24) 20-foot long trenches	0.20	\$100	\$38	\$73	\$211
					\$211

Closure Cost Estimate Expl. Roads & Pads

Project Name: Rhyolite Ridge Exploration Project- Notice or Exploration

Date of Submission: September 2018

File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm

Model Version: Version 1.4.1

Cost Data: User Data

Cost Data File: SRCE Cost Data File 1.12 Std 2018.xlsm

Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary			
	Labor	Equipment	Materials
Grading Costs	\$1,248	\$1,932	N/A
Cover Placement Cost	\$0	\$0	\$0
Regrading/Scarifying Cost	\$0	\$0	\$0
Subtotal Earthwork	\$1,248	\$1,932	\$0
Revegetation Cost	\$468	\$178	\$1,547
TOTALS	\$1,716	\$2,110	\$1,547

You must fill in ALL green cells and relevant blue cells in this section for each road													
Physical (1) - MANDATORY													
Exploration Roads & Pads - User Input													
Facility Description													
ID Code	Underlying Ground Slope % grade	Ungraded Slope % grade	Cut Slope degrees	Road + Drill Pad Length ft	Road Width ft	Number of DrB Pads	Individual Sump Volume cu yd	DrB Pad Width ft	DrB Pad Length ft	Slope Replacement Percent %	Regrade Volume (if calculated elsewhere) cu yd	Disturbed Area (if calculated elsewhere) sq ft	Growth Media Thickness in
1	Planned Drill Sites (including MW Site)	18.6	1.3	35.0	6.0	12	52	50.0	180	100%			
2	Planned Test Pit Working Area	18.6	1.3	35.0	6.0	24	0	50.0	30	100%			
3	Planned Overland Travel	0.0	0.0	0.0	6.0	0	0	0.0	0	0%			

- Notes:
1. All Physical parameters must be input even if manual overrides for volume or area are used.
 2. Slope replacement refers to the percentage of cut volume replaced during regrading.
 3. If Slope from facility to borrow source is >20, downhill travel time may be underestimated due to limitation of uphill travel time curves and downhill speed tables from CAT Handbook (see Productivity Sheet)
 4. Sump volume will be applied to all roads on slopes <20%. On slopes >20% pad width (i.e. cut volume) should be adequate to account for sump volume

You must fill in ALL green cells and relevant blue cells in this section for each road													
Exploration Roads & Pads - User Input (cont.)													
Revegetation													
Growth Media													
Grading													
Regrade Material Condition (select)	Cut Material Type (select)	Recontouring Equipment Fleet (select)	Additional Hrs for Walk-in (1)	Growth Media Material Type (select)	Growth Media Placement Fleet (select)	Maximum Fleet Size (color override)	Additional Hrs for Walk-in (1)	Seed Mix (select)	Mulch (select)	Fertilizer (select)	Scarifying/Ripping? (select)	Ripping Fleet (select)	
1	1	LS - broken	1.9					Mix 3	None	None	No	No	
2	1	LS - broken	1.9					Mix 3	None	None	No	No	
3								Mix 3	None	None	No	No	

- Notes:
1. Include gearage hours necessary to walk equipment in from drop-off point to work area
 2. Material Types are used for density correction based on Caterpillar Performance Handbook material density table

Closure Cost Estimate
Expl. Roads & Pads

Project Name: Rhyolite Ridge Exploration Project- Notice or Exploration
 Date of Submittal: September 2018
 File Name: 38431.Rhyolite Ridge Notice.RCE.V2.tsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE Cost Data File 1_12_Sld_2018.tsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary				
	Labor	Equipment	Materials	Totals
Grading Costs				
Cover Placement Cost	\$1,248	\$1,932	N/A	\$3,180
Rippling/Scarifying Cost	\$0	\$0	N/A	\$0
Revegetation Cost	\$1,248	\$1,932	N/A	\$3,180
TOTALS	\$1,248	\$2,110	\$1,547	\$5,373

Exploration Roads & Pads - Calculations

Regrading Volume and Footprint Volume

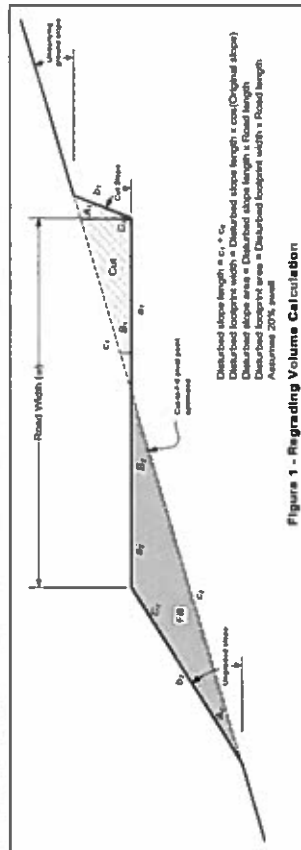


Figure 1 - Regrading Volume Calculation

Will not allow dozer for slopes greater than 30%
 For dozer regrading push distance = road width
 Assumes dozer push is uphill
 Assumes minimum push distance of 100 ft

Swell Factor: 1.2

Rippling/Scarifying Calculations

Minimum 1 hr rippling/scarifying time per area
 Number of passes = Final slope length ÷ Grader width
 Travel distance = Number of passes × Road length
 Total hours = (Travel distance ÷ Grader productivity) × (Number of passes × Grader maneuver time)
 For dozer regrading assumes push distance = 3 × road width

Revegetation Calculations

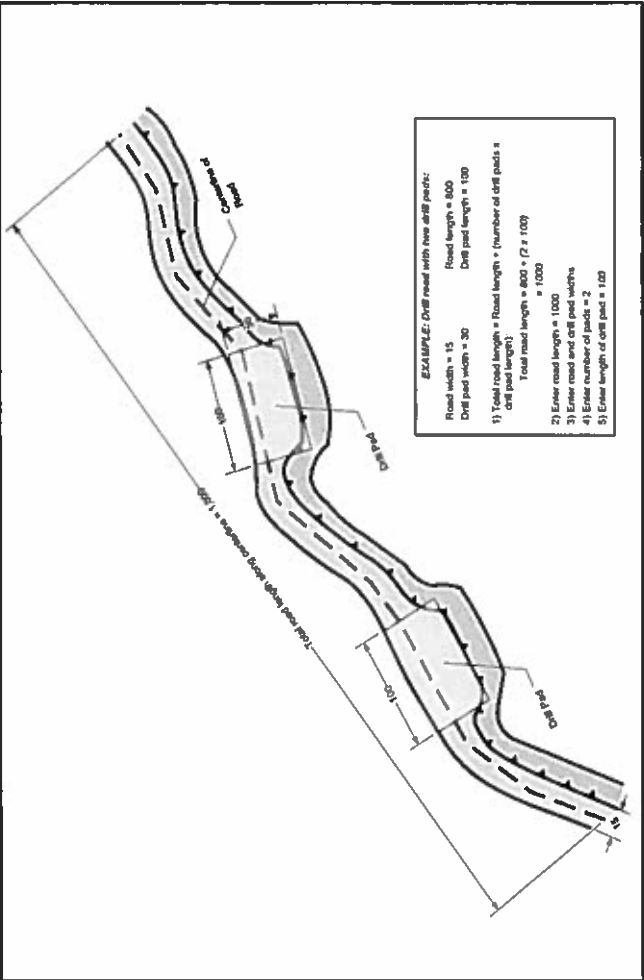
Minimum of 1 acre crew time per area

Closure Cost Estimate
Expl. Roads & Pads

Project Name: Rhyolite Ridge Exploration Project- Notice of Exploration
Date of Submittal: September 2018
File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm
Model Version: Version 1.4.1
Cost Data: User Data
Cost Data File: SRCE Cost Data File 1 12 Std 2018.xlsm
Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary				
	Labor	Equipment	Materials	Totals
Grading Costs	\$1,248	\$1,932	N/A	\$3,180
Cover Placement Cost	\$0	\$0	N/A	\$0
Ripping/Scarifying Cost	\$0	\$0	N/A	\$0
Subtotal Earthworks	\$1,248	\$1,932	N/A	\$3,180
Revegetation Cost	\$468	\$178	\$1,517	\$2,163
TOTALS	\$1,716	\$2,110	\$1,517	\$5,373

Inputting Exploration Roads and Drill Pads



**Closure Cost Estimate
Expl. Roads & Pads**

Project Name: Rhyolite Ridge Exploration Project- Notice of Exploration
 Date of Submission: September 2018
 File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE Cost Data File 1.12 Std 2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary				
	Labor	Equipment	Materials	Totals
Grading Costs	\$1,248	\$1,932	N/A	\$3,180
Cover Placement Cost	\$0	\$0	N/A	\$0
Ripping/Scarifying Cost	\$0	\$0	N/A	\$0
Subsoil Earthworks	\$1,248	\$1,932		\$3,180
Revegetation Cost	\$468	\$1,716	\$1,547	\$3,731
TOTALS	\$1,716	\$2,110	\$1,547	\$5,373

Exploration Roads & Pads - Regrading Costs									
	Description (required)	Total Road Length ft	Total Drill Pad Length ft	Regrading Volume cy	Recontouring Fleet	Equipment Productivity ctyr	Total Equipment Hours hr	Total Labor Cost \$	Total Equipment Cost \$
1	Planned Drill Sites (including MW Site)	0	1,200	2,382	DGR	93	13	\$954	\$1,477
2	Planned Test PH Working Area	11,100	720	380	DGR	93	4	\$294	\$455
3	Planned Overland Travel	15,100	0	2,762		Material Type	17	\$1,248	\$1,932
									\$3,180

(1) Includes walk-in time based on distance and travel speed (see Productivity sheet for speeds)

Exploration Roads & Pads - Growth Media Costs									
	Description (required)	Growth Media Volume cy	Growth Media Replacement Fleet	Number of Trucks/ Scrapers	Total Fleet Hours	Total Labor Cost \$	Total Equipment Cost \$	Total Growth Media Cost \$	Total
1	Planned Drill Sites (including MW Site)					\$0	\$0	\$0	\$0
2	Planned Test PH Working Area					\$0	\$0	\$0	\$0
3	Planned Overland Travel					\$0	\$0	\$0	\$0

Exploration Roads & Pads - Scarifying/Revegetation Costs									
	Description (required)	Surface Area acres	Ripping/Scarifying Fleet	Ripping Equipment Hours hrs	Ripping Labor Cost \$	Ripping Equipment Cost \$	Revegetation Labor Cost \$	Revegetation Equipment Cost \$	Total Revegetation Cost \$
1	Planned Drill Sites (including MW Site)	1.60				\$160	\$65	\$545	\$805
2	Planned Test PH Working Area	0.35				\$35	\$8	\$71	\$43
3	Planned Overland Travel	2.05				\$205	\$178	\$1,655	\$2,038
		4.00			\$0	\$463	\$178	\$1,547	\$2,188

Closure Cost Estimate Monitoring

Project Name: Rhyolite Ridge Exploration Project- Notice or Exploration

Date of Submittal: September 2018

File Name: 3843I.Rhyolite Ridge Notice.RCE.V2.xlsm

Model Version: Version 1.4.1

Cost Data: User Data

Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm

Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Reclamation Monitoring & Maintenance - Cost Summary				
	Labor	Equipment	Lab & Materials	Totals
Revegetation Maintenance	\$45	\$17	\$162	\$224
Erosion Maintenance	\$0	\$0	N/A	\$0
Reclamation Monitoring	\$4,100	\$485	N/A	\$4,585
Subtotal Reclamation Monitoring	\$4,145	\$502	\$162	\$4,809
Water Quality Monitoring	\$0	\$0	\$0	\$0
TOTAL MONITORING	\$4,145	\$502	\$162	\$4,809

Reclamation Maintenance								
Description	Total Revegetation Surface Area (1,2) acres	% Area Requiring Reseeding	Seed Mix (select)	Area Requiring Reseeding acres	Seed \$/acres	Labor \$/acres	Equipment \$/acres	Totals \$
Revegetation Maintenance	4	10%	Mix 3	0.4	\$363.00	\$100.00	\$38.00	
Labor								\$45
Equipment								\$17
Materials								\$162
Cost/Acre								\$501
							Subtotal	\$224

Notes: 1) Surface area is NOT the same as footprint disturbance area typically used for permitting purposes.

	Total Volume Growth Media cy	% Volume Requiring Maintenance	Average Growth Media Placement Cost \$/CY	Volume Requiring Replacement cy		Labor (assume: 25%) \$/acres	Equipment (assume: 75%) \$/acres	Total \$
Erosion Maintenance	0		\$0.00	0		\$0.00	\$0.00	\$0

Notes

Reclamation Monitoring					
Description	Hrs/Day	Days/Year	Number of Years	Rate \$/hr	
Field Work					
Field Geologist/Engineer				\$149.49	\$0
Range Scientist	6	1	3	\$136.68	\$2,460
Reporting					
Field Geologist/Engineer				\$149.49	\$0
Range Scientist	4	1	3	\$136.68	\$1,640
					Subtotal \$4,100
Travel					
	Hrs/Trip hr	Trips/Year	Years	Truck Cost \$/hr	
Travel	6	1	3	\$26.97	\$485
					Subtotal \$485
					Total Reclamation Monitoring \$4,585

Notes

Closure Cost Estimate
Well Abandonment

Project Name: Rhyolite Ridge Exploration Project- Notice or Exploration
Date of Submittal: September 2018
File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm
Model Version: Version 1.4.1
Cost Data: User Data
Cost Data File: SRCE_Cost_Data_File_1_12_Sld_2018.xlsm
Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Well Abandonment				
	Labor	Equipment	Materials	Totals
Production, Dewatering, Infiltration Wells	\$0	\$0	\$0	\$0
Monitoring Wells	\$383	\$132	\$3	\$518
TOTALS	\$383	\$132	\$3	\$518

Production, Dewatering and Infiltration Well Closure

Description (required)	ID Code	Number of Holes	Casing Diam in	Average Depth ⁽¹⁾ ft bgs	Original Static Water Level ft bgs	Top of Slotted Casing ⁽²⁾ ft bgs	Blank Casing Below Top of Screen ⁽³⁾ ft	Type of Pump (if any) (select)	Depth to Pump ft bgs	Hole Plug Method (select)	Casing Volume per ft cf	Perforation Length ⁽³⁴⁾ ft	GROUT Volume per Hole ⁽⁴⁵⁾ cy	Cement Volume per Hole ⁽⁶⁾ cy	Inert Media Volume per Hole ⁽⁷⁾ cy	Pump Removal Labor Cost \$	Pump Removal Equip Cost \$	Perf Labor Cost \$	Perf Equip Cost ⁽⁸⁾ \$	GROUT + Cement Labor Cost ⁽⁹⁾ \$	GROUT + Cement Equip Cost ⁽⁹⁾ \$	GROUT + Cement Material Cost \$	Inert Media Labor Cost ⁽¹⁰⁾ \$	Inert Media Equip Cost ⁽¹⁰⁾ \$	Total Cost \$	
																\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

- For previously abandoned holes enter "0" for depth.
- (a) Wells abandoned per Nevada Administrative Code (NAC 534.420). Hole grouted and perforated from bottom to 50 feet (15.24m) above the top of the screen, or first water encountered or original static water level, depending on vertical hydraulic gradient and well construction parameters. Inert media (cuttings or alluvium) used from top of grout to top seal.
- (b) Perforation length = amount of blank casing below first water (for confined aquifers) or predicted recovered water table (unconfined aquifers) + 50 feet (15.24m) of blank casing above water table.
- (c) Assumes 50' (15.24m) sanitary seal at top of hole. Therefore perforation and grouting only required to bottom of sanitary seal.
- (d) Assumes 100% loss to formation for grout (abandonite) for screened and perforated sections.
- (e) Assumes 20' (6m) top seal of cement in casing only. See note 4.
- (f) Inert material is cuttings or alluvium sourced locally.
- (g) Includes perforation tool wear cost/ft of perforation (see Productivity Sheet).
- (h) See Productivity Sheet for hourly production. Minimum 1 hr per hole + fixed hours per hole for move and setup. If no perforation required, use standard drill rig.
- (i) See Productivity Sheet for hourly production. Minimum 1 hr per hole.

Notes:

Monitoring Well Closure

Description (required)	ID Code	Number of Holes	Casing Diam in	Average Depth ft bgs	Top of Screen ⁽¹⁾ ft bgs	Hole Plug Method (select)	Casing Volume per ft ft3	GROUT Volume ⁽²⁾ cy	Cement Volume per Hole ⁽³⁾ cy	Inert Backfill Volume per Hole ⁽⁴⁾ cy	Total Grouting Hours/ Hole hr	Total Inert Media Hours/ Hole hr	GROUT + Cement Labor Cost ⁽⁵⁾ \$	GROUT + Cement Equip Cost ⁽⁵⁾ \$	GROUT + Cement Material Cost \$	Inert Material Labor Cost ⁽⁷⁾ \$	Inert Material Equip Cost ⁽⁷⁾ \$	Total Cost \$
GWI/Peizometer Well		1	4.0	360	300	Cement Pl	0.090		0.08	0.77		3.0	\$0	\$0	\$3	\$383	\$132	\$518
													\$0	\$0	\$3	\$383	\$132	\$518

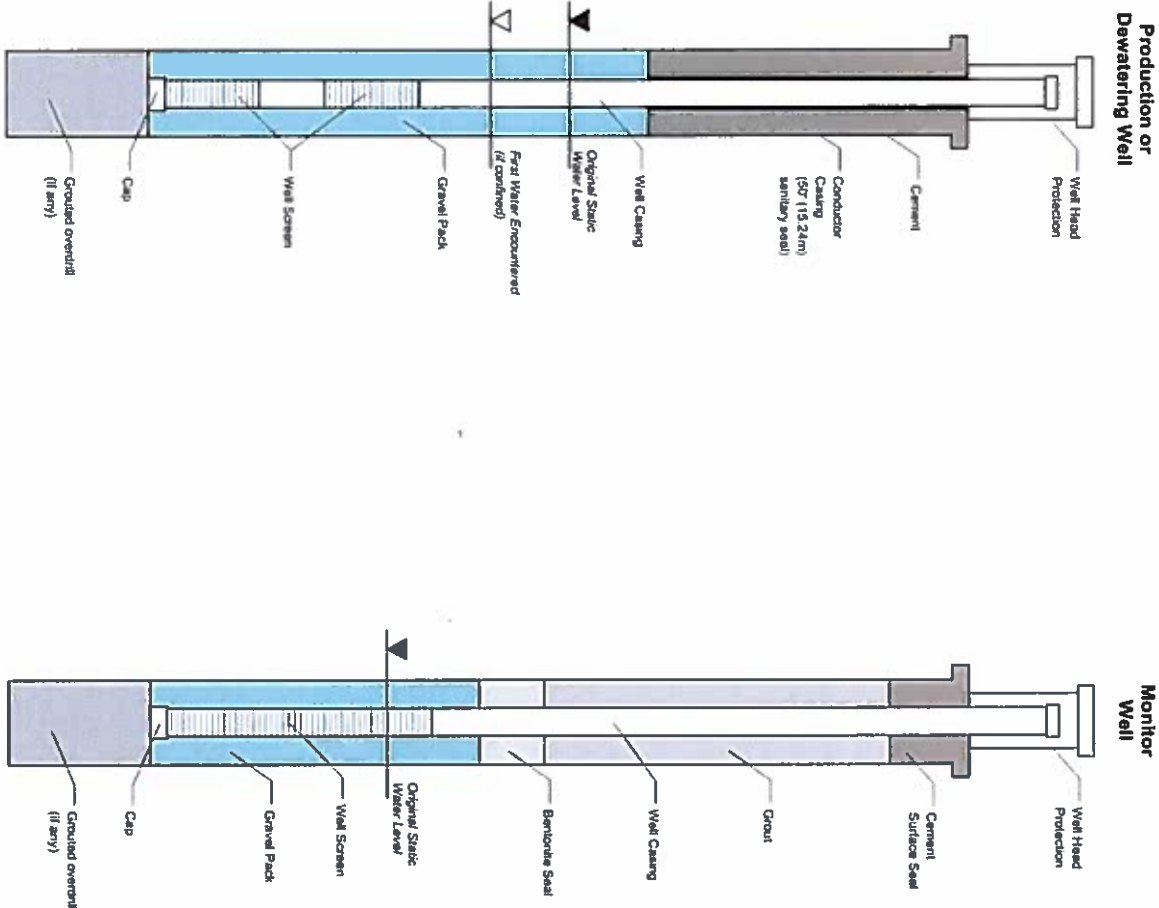
- Wells abandoned per NAC 534.420 with bentonite grout placed to 50 feet above the top of the screen (see note 1).
- (1) Assumes top of screen is at or above the static water level (in unconfined aquifers) or the depth of first water encountered (in confined aquifers).
- (2) Assumes 25% loss to formation for grouting.
- (3) Grouting only required to 50' (15.24m) above the top of screen because monitor wells are constructed with a seal in the annular space.
- (4) Assumes top 20' (6m) plugged with cement.
- (5) Assumes hole plugged with inert material (cuttings or alluvium) above grout up to cement surface plug.
- (6) See Productivity Sheet for hourly production. Minimum 1 hr per hole + fixed hours per hole for move and setup (see Productivity Sheet).
- (7) See Productivity Sheet for hourly production. Minimum 1 hr per hole.

Notes:

Project Name: Rhyolite Ridge Exploration Project- Notice or Exploration
Date of Submittal: September 2018
File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm
Model Version: Version 1.4.1
Cost Data: User Data
Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Well Abandonment				
	Labor	Equipment	Materials	Total
Production, Dewatering, Initiation Wells	\$0	\$0	\$0	\$0
Monitoring Wells	\$383	\$132	\$3	\$518
TOTAL S	\$383	\$132	\$3	\$518

Well Construction



2018 MOB/DEMOB using R.S. MEANS and SRCE equipment and DAVIS-BACON wages										
blue font is for project specific user input		Miles from Washoe County Courthouse to project, one way							300	
		Miles from equipment rental yard to project, one way (9)							283	
PMU - Rhyolite Ridge Notice - September 2018, Mob from Las Vegas, NV		Hours travel time @ 55 MPH							5.15	
Equipment	Mobilization \$/hour (1)	\$ Flat rate load & unload (2)	\$/hour Deadhead (empty return cost) (3)	Disassembly and assembly (4)	Permit cost \$ (5)	Pilot car costs	# of units	One Way Mob Cost	Total Mob and Demob Cost	
Bulldozers										
D6R	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -	1	\$ 1,113	\$ 2,225	
D7R	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 468	1	\$ 1,933	\$ 3,866	
D8R	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -	
D9R	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -	
D10R	\$ 150	\$ 150	\$ 150	\$ 65,940	\$ 25	\$ 974		\$ -	\$ -	
D11R (two transports) (7)	\$ 150	\$ 150	\$ 150	\$ 139,848	\$ 25	\$ 649		\$ -	\$ -	
Motor Graders										
14G/H	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
18G/H	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 325		\$ -	\$ -	
Track Excavators										
320C	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -	
325C	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -	
345B	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -	
385BL	\$ 150	\$ 150	\$ 150	\$ 46,260	\$ 25	\$ 649		\$ -	\$ -	
Scrapers										
631G	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -	
637G PP	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -	
Wheeled Loaders										
928G	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
968G	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
972G	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -	
988G	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 325		\$ -	\$ -	
992G (two transports) (7)	\$ 150	\$ 150	\$ 150	\$ 78,440	\$ 25	\$ 649		\$ -	\$ -	
Hydraulic Hammers										
H-120 (fits 325) no charge, mobilize with machine	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
H-160 (fits 345) no charge, mobilize with machine	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
H-180 (fits 365/385) no charge, mobilize with machine	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Other Equipment										
420D 4WD Backhoe	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
CS563E Vibratory Roller	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
Light Truck - 1.5 Ton	\$ 63	\$ 63	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Supervisor's Truck	\$ 56	\$ 56	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Air Compressor + tools	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
Welding Equipment	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
Heavy Duty Drill Rig	\$ 392	\$ 392	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Pump (plugging) Drill Rig	\$ 392	\$ 392	\$ -	\$ -	\$ -	\$ -	1	\$ 2,408	\$ 4,816	
Concrete Pump	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
Gas Engine Vibrator	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
Generator 5KW	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
HDEP Welder (pipe or liner)	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
5 Ton Crane Truck	\$ 94	\$ 94	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
25 Ton Crane	\$ 135	\$ 135	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Trucks										
725	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
740	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 325		\$ -	\$ -	
769D	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 649		\$ -	\$ -	
777D (two transports) (8)	\$ 150	\$ 150	\$ 150	\$ 73,452	\$ 25	\$ 974		\$ -	\$ -	
813E (5,000 gal) Water Wagon	\$ 150	\$ 150	\$ 150	\$ -	\$ -	\$ -		\$ -	\$ -	
821E (8,000 gal) Water Wagon	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -	
Dump Truck (10-12 yd ³)	\$ 112	\$ 112	\$ 112	\$ -	\$ -	\$ -		\$ -	\$ -	
Miscellaneous										
Equipment for dry hole abandonment (420D 4WD)	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
Pilot car (Light Truck)	\$ 56	\$ 56	\$ 56	\$ -	\$ -	\$ -		\$ -	\$ -	
Truck Tractor + Lowbed Trailer 75 ton	\$ 150	\$ 150	\$ 150	\$ -	\$ -	\$ -		\$ -	\$ -	
Truck Tractor + Flatbed Trailer 40 ton	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -	
Light Truck + Flatbed Trailer 25 ton	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
							3	\$ 10,908		
Footnotes and explanations of assumptions										
(1) The sum of the cost of equipment from either the SRCE or RSM equipment tab plus Davis-Bacon labor tab										
(2) Assumes minimum of 30 minutes load and secure and 30 minutes unsecure and unload machine.										
(3) No "Deadhead" (empty) charge for Mob up to 50 miles. More than 50 miles the cost of deadhead same rate as loaded miles.										
(4) Only large equipment requires disassembly for transport. Includes cost of mechanic + mechanic's truck + crane operator + crane.										
(5) Nevada Dept. of Transportation oversized permits are \$25 per trip or \$60 per year.										
(6) Sum of mobilization plus all ancillary costs for one way loaded and return empty.										
(7) Two transports are required but the second transport does not need pilot cars or permits or a heavy duty trailer.										
(8) Two transports required with both requiring full complement of pilot cars and permits.										
(9) For large mining operations, mobilization may be required from more than one location. For example, the Elko yard may not have four 631 scrapers. Additional equipment may need to mobilize from Reno, Las Vegas, or Salt Lake City. Input the further distance here.										
(10) Pilot Car costs based on SRCE light truck costs and Davis-Bacon wages										
(11) SRCE costs based on July 2018 vendor quotes.										
(12) RS Means costs based on R S Means Heavy Construction Cost Data, 2018 Q2										
(13) Davis Bacon wages based on 2018 determination.										

**Closure Cost Estimate
Labor Rates**

Project Name: Rhyolite Ridge Exploration Project- Notice of Exploration
 Date of Submittal: September 2018
 File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Color Code Key	
User Input - Direct Input	Direct Input
User Input - Pull Down List	Pull Down Selection
Program Constant (can override)	Alternate Input
Program Calculated Value	Locked Cell - Formula or Reference

ZONE ADJUSTMENTS		
Cost Basis/Project Region	S. Nevada Notice Level	Clark, Esmeralda, Lincoln and Nye Counties
Power Equipment Operators	>60 miles	\$3.50
Truck Drivers	>70 miles	\$3.50
Laborers	>50 miles	\$3.25
INDIRECT COSTS		
Unemployment (%)	3.00%	
Retirement/SS/Medicare (%)	7.65%	
Workman's Compensation (%)	0.075	
Other Indirects		
State Payroll Tax (13) (15) (17)		
Total Other Indirects	0.06%	

HOURLY LABOR RATE TABLE										
EQUIPMENT TYPE (1) OR JOB DESCRIPTION	Labor Group	Base Rate (\$/hr)	Zone Adjustment (\$/hr)	Hourly Wage (\$/hr)	Fringe (\$/hr)	Retirement/ Medicare (\$/hr)	Unemployment Insurance (\$/hr)	Workman's Compensation (\$/hr)	Other Indirect Costs (\$/hr)	Total (\$/hr)
Equipment Operators (\$/hr) (2)										
Bulldozers										
D6R	Group 6	\$58.82	\$3.50	\$62.32	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D6R w/ Winch					\$0.00					
D7R	Group 6	\$58.82	\$3.50	\$62.32	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D8R	Group 6	\$58.82	\$3.50	\$62.32	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D9R	Group 6	\$58.82	\$3.50	\$62.32	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D10R	Group 6	\$58.82	\$3.50	\$62.32	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D11R	Group 6	\$58.82	\$3.50	\$62.32	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
Wheeled Dozers										
824G					\$0.00					
834G					\$0.00					
844					\$0.00					
854G					\$0.00					
Motor Graders										
120H	Group 10	\$58.83	\$3.50	\$62.33	\$0.00	\$1.87	\$4.77	\$4.66	\$0.00	\$73.67
14GH	Group 10	\$58.83	\$3.50	\$62.33	\$0.00	\$1.87	\$4.77	\$4.66	\$0.00	\$73.67
16GH	Group 10	\$58.83	\$3.50	\$62.33	\$0.00	\$1.87	\$4.77	\$4.66	\$0.00	\$73.67
24M					\$0.00					
Track Excavators										
312C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
320C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
325C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
330C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
345B	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
365BL					\$0.00					
385BL	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
Scrapers										
631G	Group 15	\$59.23	\$3.50	\$62.73	\$0.00	\$1.88	\$4.80	\$4.70	\$0.00	\$74.12
637G	Group 15	\$59.23	\$3.50	\$62.73	\$0.00	\$1.88	\$4.80	\$4.70	\$0.00	\$74.12
Wheeled Loaders										
924G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
928G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
950G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
966G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
972G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
980G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
986G	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
990					\$0.00					
992G	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
994D					\$0.00					
L2350					\$0.00					
Shovels										
PC2000					\$0.00					
PC3000					\$0.00					
PC4000					\$0.00					
PC5500					\$0.00					
PC8000					\$0.00					
Hydraulic Hammers										
H-120 (fits 325)										
H-160 (fits 345)										
H-180 (fits 365/385)										
Demolition Shears										
S340 (fits 322/325/330)										
S365 (fits 330/345)										
S390 (fits 365/385)										
Demolition Grapples										
G315 (fits 322/325)										
G320 (fits 325/330)										
G330 (fits 345/365)										

**Closure Cost Estimate
Labor Rates**

Project Name: Rhyolite Ridge Exploration Project- Notice of Exploration
 Date of Submittal: September 2018
 File Name: 38431.Rhyolite Ridge Notice.RCE.V2.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Color Code Key	
User Input - Direct Input	Direct Input
User Input - Pull Down List	Pull Down Selection
Program Constant (can override)	Alternate Input
Program Calculated Value	Locked Cell - Formula or Reference

ZONE ADJUSTMENTS

Cost Basis/Project Region	S. Nevada Notice Level	Clark, Esmeralda, Lincoln and Nye Counties
Power Equipment Operators	>68 miles	\$3.50
Truck Drivers	>70 miles	\$3.50
Laborers	>50 miles	\$3.25

INDIRECT COSTS

Unemployment (%)	3.00%
Retirement/SS/Medicare (%)	7.6%
Workman's Compensation (%)	0.0%

Other Indirects

State Payroll Tax (13),(15),(17)	
Total Other Indirects	0.00%

HOURLY LABOR RATE TABLE

Other Equipment										
4200 4WD Backhoe	Group 4	\$58.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00	\$73.13
4280 4WD Backhoe	Group 4	\$58.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00	\$73.13
C8533E Vibratory Roller	Group 4	\$58.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00	\$73.13
C8533E Vibratory Roller					\$0.00					
CP533E Sheepfoot Compactor					\$0.00					
CP633E Sheepfoot Compactor					\$0.00					
Light Truck - 1.5 Ton					\$0.00					
Supervisor's Truck					\$0.00					
Flatbed Truck					\$0.00					
Air Compressor + tools	Group 1	\$55.67	\$3.50	\$59.17	\$0.00	\$1.78	\$4.53	\$4.44	\$0.00	\$69.91
Welding Equipment	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
Heavy Duty Drill Rig	Group 2	\$56.62	\$3.50	\$60.12	\$0.00	\$1.80	\$4.60	\$4.51	\$0.00	\$71.03
Pump (plugging) Drill Rig	Group 2	\$56.62	\$3.50	\$60.12	\$0.00	\$1.80	\$4.60	\$4.51	\$0.00	\$71.03
Concrete Pump					\$0.00					
Gas Engine Vibrator	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
Generator 5KW					\$0.00					
HDEP Welder (pipe or liner)					\$0.00					
5 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
20 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
50 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
120 Ton Crane					\$0.00					

NOTES:

(1) Equipment Type:	Caterpillar model or equivalent, LeTourneau
(2) Equipment Operator Source:	D-B NV18034 01/05/2018
(3) Zone Basis:	From Las Vegas City Hall

Truck Drivers (\$/hr) (4)

725	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
730	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
735	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
740	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
789D	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
773E					\$0.00					
777D	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
785C					\$0.00					
783C					\$0.00					
797B					\$0.00					
613E (5,000 gal) Water Wagon	Group 3	\$48.44	\$3.50	\$49.94	\$0.00	\$1.50	\$3.82	\$3.75	\$0.00	\$59.00
621E (8,000 gal) Water Wagon	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
777D Water Truck					\$0.00					
785C Water Truck					\$0.00					
Dump Truck (10-12 yd3)	Group 2	\$48.23	\$3.50	\$49.73	\$0.00	\$1.49	\$3.80	\$3.73	\$0.00	\$58.78

NOTES:

(4) Truck Driver Source:	D-B NV1803401/05/2018
(5) Zone Basis:	From Las Vegas City Hall

Color Code Key	
User Input - Direct Input	Direct Input
User Input - Pull Down List	Pull Down Selection
Program Constant (can override)	Alternate Input
Program Calculated Value	Locked Cell - Formula or Reference

	S. Nevada Notice Level	Clark, Esmeraldas, Lincoln and Nye Counties
Cost Basis/Project Region		
Power Equipment Operators	>60 miles	\$3.50
Truck Drivers	>78 miles	\$3.50
Laborers	>50 miles	\$3.25

Unemployment (%)	3.00%
Retirement/SS/Medicare (%)	7.65%
Workman's Compensation (%)	0.07%
Other Indirects	
State Payroll Tax (13), (15), (17)	
Total Other Indirects	0.00%

Laborers (\$/hr) (6,7)										
General Laborer	Group 1	\$42.94	\$3.25	\$46.19	\$0.00	\$1.39	\$3.53	\$3.46	\$0.00	\$54.57
Skilled Laborer	Group 3	\$43.25	\$3.25	\$46.50	\$0.00	\$1.40	\$3.56	\$3.49	\$0.00	\$54.94
Driver's Helper	Group 2	\$43.15	\$3.25	\$46.40	\$0.00	\$1.39	\$3.55	\$3.48	\$0.00	\$54.82
Rodman (reinforcing concrete)	Group 4	\$43.34	\$3.25	\$46.59	\$0.00	\$1.40	\$3.56	\$3.49	\$0.00	\$55.05
Cement Finisher	Group 4	\$43.34	\$3.25	\$46.59	\$0.00	\$1.40	\$3.56	\$3.49	\$0.00	\$55.05
Carpenter		\$48.95	\$3.25	\$52.20	\$0.00	\$1.57	\$3.99	\$3.92	\$0.00	\$61.67

(6) Laborer Source	D-8 SURV2011-001 10/12/2010
(7) Carpenter Source	D-8 SURV2011-001 10/12/2010
(8) Zone Base	From Las Vegas City Hall

[illegible]

(9) Project Manager:	R/S Means 2018 C2 (01 31 1320 0300 Total Incl. O&P-10%) Adjusted for Etko, NV
(01 Foreman Source	R/S Means 2018 C2 (01 31 1320 0300 Total Incl. O&P-10%) Adjusted for Etko, NV
(9) Technical Labor Source	SPK Consulting 2018 (Total Incl. O&P-10%) Adjusted for Zone, Tax and Ins.
Other Labor Source	
Other Labor Source	
Additional User Markups	
(These are added by the user to the base rate to account for site-specific conditions or company's profit/expense)	

ATTACHMENT C



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
Tonopah Field Office
P.O. Box 911 (1553 South Main Street)
Tonopah, Nevada 89049
Phone: 775-482-7800 Fax: 775-482-7810
<https://www.blm.gov/nevada>

In Reply Refer To:
N-97202
3809 (NVB0200)

OCT 10 2018

CERTIFIED MAIL – RETURN RECEIPT REQUESTED 7018 0360 0001 7288 4733

DECISION

Paradigm Minerals USA Corp.	:	43 CFR 3809 – Surface Management
Matt Weaver, Senior VP	:	Notice
241 Ridge St., #210	:	
Reno, NV 89501	:	

Determination of Required Financial Guarantee Amount

Description of Notice

The notice for the **Rhyolite Ridge Exploration Project** was received in this office on September 25, 2018. The project area is located on public lands in Esmeralda County, Nevada in sections 19, 20, 28, 29 and 32, T. 1 S., R. 37 E., Mount Diablo Meridian. Your notice proposes test pit excavations, drilling, and installation of ground water monitoring wells using existing roads and planned overland routes for a total of 3.96 acres of disturbance. The proposed operations were reviewed by various resource specialists who have determined that the operation, as proposed, will not cause unnecessary or undue degradation as defined under 43 CFR 3809.5. The Bureau of Land Management (BLM) casefile number for your notice is **N-97202**. Please refer to this number in any future communication concerning this notice.

Please be advised that the State of Nevada has revised the requirements for drilling wells and sampling for dissolved mineral resources, effective January 1, 2018. In accordance with 43 CFR 3809.420(a)(6), "you must conduct all operations in a manner that complies with all pertinent Federal and state laws." We encourage you to contact the Nevada Division of Minerals (NDOM) at (775) 684-7040 or visit <http://minerals.nv.gov/Programs/DMRE/DMRE/> to learn more about these changes and ensure compliance with the requirement of § 3809.420(a)(6).

Amount of Financial Guarantee

A member of the Tonopah Field Office staff has reviewed your reclamation cost estimate and determined that a financial guarantee of \$33,203.00 is sufficient to complete reclamation of the proposed disturbance. The amount of the reclamation cost estimate is based on operator compliance with all applicable operating and reclamation requirements.

All line items contained in the reclamation cost estimate are not to be considered as the limits of financial guarantee expenditures in that respective category or task should forfeiture of the financial guarantee be necessary. The line items listed are solely for the purpose of arriving at a total amount for the financial guarantee. This total amount may be spent however the BLM deems necessary to implement the approved reclamation plan, and does not represent a reclamation cost limit or constraint.

The BLM's review of your proposed operations, determination that your notice filing is complete, determination that your operations as proposed will not cause unnecessary or undue degradation and decision concerning the amount of the required financial guarantee does not relieve you, the operator, of your responsibility to be in compliance with all applicable Federal, State and local laws and regulations, and to obtain all applicable Federal, State and local authorizations and permits. You are responsible for preventing any unnecessary or undue degradation of public lands and resources, and for reclaiming all lands disturbed by your operations.

Required Financial Guarantee

A financial guarantee in the amount of **\$33,203.00** must be filed and accepted, before you begin any surface disturbing operations, at the address below:

BLM -Nevada State Office
Branch of Mineral Resources (Solids)
1340 Financial Blvd.
Reno, Nevada 89502

You must receive *written notification* from that office accepting and obligating your financial guarantee before you may begin any surface disturbing operations. The types of financial instruments that are acceptable to the BLM are found at 43 CFR 3809.555. Please contact the BLM Branch of Mineral Resources (Solids) at (775) 861-6400 for further information on the adjudication of financial guarantees.

This decision does not constitute certification of ownership to any entity named in the notice; recognition of the validity of associated mining claims; or recognition of the economic feasibility of the proposed operations.

Term of Notice

Your notice will remain in effect for two years from the date of this decision, unless you notify this office beforehand that operations have ceased and reclamation is complete. If you wish to conduct operations for another two years after the expiration date of your notice, you must notify this office in writing on or before the expiration date as required by 43 CFR 3809.333.

Resource Conditions

Resource specific conditions are included as an attachment to this letter.

Guidelines for Operations Conducted under a Notice

The enclosed document provides additional guidelines concerning your notice, as well as, specific resource guidelines specific to this geographic area.

Appeal of the Decision

If you are adversely affected by this decision, you may request that the BLM Nevada State Director review this decision. If you request a State Director Review, the request must be received in the BLM Nevada State Office at 1340 Financial Blvd., Reno, Nevada 89502, no later than 30 calendar days after you receive or have been notified of this decision. The request for State Director Review must be filed in accordance with the provisions in 43 CFR 3809.805. This decision will remain in effect while the State Director Review is pending, unless a stay (suspension) is granted by the State Director. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

If the State Director does not make a decision on your request for review of this decision within 21 days of receipt of the request, you should consider the request declined and you may appeal this decision to the Interior Board of Land Appeals (IBLA). You may contact the BLM Nevada State Office to determine when the BLM received the request for State Director Review. You have 30 days from the end of the 21-day period in which to file your Notice of Appeal with this office at P.O. Box 911, 1553 S. Main St, Tonopah, NV 89049, which we will forward to IBLA.

If you wish to bypass a State Director Review, this decision may be appealed directly to the IBLA in accordance with the regulations at 43 CFR 3809.801(a) (1). Your Notice of Appeal must be filed in this office at P.O. Box 911, 1553 S. Main St, Tonopah, NV 89049, within 30 days from receipt of this decision. As the appellant you have the burden of showing that the decision appealed from is in error. Enclosed is BLM Form 1842-1 that contains information on taking appeals to the IBLA.

This decision will remain in effect while the IBLA reviews the case, unless a stay is granted by the IBLA. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Request for a Stay

If you wish to file a petition (request) pursuant to regulations 43 CFR 4.21 for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by IBLA, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of this notice of appeal and petition for a stay must also be submitted to each party named in the decision and to the IBLA and to the appropriate Office of the Solicitor (see 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal must show sufficient justification based on the following standards:

1. The relative harm to parties if the stay is granted or denied.
2. The likelihood of the appellant's success on the merits.
3. The likelihood of immediate and irreparable harm if the stay is not granted.
4. Whether the public interest favors granting the stay.

If you have any questions, please contact Earl C. Numinen, Assistant Field Manager, Non-Renewable Resources, at (775) 482-7800.


for Timothy J. Coward
Field Manager

Enclosures

cc:

BLM Nevada

Branch of Mineral Resources (Solids)

Lowell Price

Fluid Minerals Program Manager

Nevada Division of Minerals

400 West King Street, Suite 106

Carson City, Nevada 89703-4212

**Closure Cost Estimate
Property Information**

Enter Data Below in Green and Blue Spaces

STANDARDIZED RECLAMATION COST ESTIMATOR

Version 1.4.1

Build 017b (revised to work with Excel 2016 - 24 Oct 2016)

Approved for use in Nevada, August 1, 2012

COST DATA FILE INFORMATION	
File Name:	2017 SRCE_Version_1_4_1_017_NV.xlsm
Cost Data File:	SRCE_Cost_Data_File_1_12_Std_2018.xlsm
Cost Data Date:	August 1, 2018
Cost Data Basis:	User Data Data Cost Units: Imperial
Author/Source:	Nevada Division of Environmental Protection (NDEP) & NV BLM
PROJECT INFORMATION	
Property/Mine Name:	Rhyolite Ridge Exploration Project Property Code:
Project Name:	Rhyolite Ridge Exploration Project
Date of Submittal:	September 2018 Average Altitude: 5000 ft.
Select One:	<input checked="" type="checkbox"/> Notice or Sm Exploration Plan <input type="checkbox"/> Lg Exploration Plan <input type="checkbox"/> Mine Operation
Select One:	<input type="checkbox"/> Private Land <input checked="" type="checkbox"/> Public or Public/Private
Cost Estimate Type:	Surety
Cost Basis Category:	S. Nevada Notice Level
Clark, Esmeralda, Lincoln and Nye Counties	
Cost Basis Description:	

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**Closure Cost Estimate
Cost Summary**

Project Name: Rhyolite Ridge Exploration Project
Project Date: September 2018
Model Version: Version 1.4.1
File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm

A. Earthwork/Recontouring	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Exploration	\$2,218	\$2,973	\$12	\$5,203
Exploration Roads & Drill Pads	\$1,248	\$1,932	\$0	\$3,180
Roads	\$0	\$0	\$0	\$0
Well Abandonment	\$383	\$132	\$3	\$518
Pits	\$0	\$0	N/A	\$0
Quarries & Borrow Areas	\$0	\$0	\$0	\$0
Underground Openings	\$0	\$0	\$0	\$0
Process Ponds	\$0	\$0	\$0	\$0
Heaps	\$0	\$0	\$0	\$0
Waste Rock Dumps	\$0	\$0	\$0	\$0
Landfills	\$0	\$0	\$0	\$0
Tailings	\$0	\$0	\$0	\$0
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Yards, Etc.	\$0	\$0	\$0	\$0
Drainage & Sediment Control	\$0	\$0	\$0	\$0
Generic Material Hauling	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal	\$3,849	\$5,037	\$15	\$8,901
Mob/Demob if included in Other User sheet	\$0	\$0	\$0	\$0
Mob/Demob	\$5,454	\$5,454		\$10,908
Subtotal "A"	\$9,303	\$10,491	\$15	\$19,809
B. Revegetation/Stabilization	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Exploration	\$100	\$38	\$73	\$211
Exploration Roads & Drill Pads	\$468	\$178	\$1,547	\$2,193
Roads	\$0	\$0	\$0	\$0
Well Abandonment				N/A
Pits	\$0	\$0	\$0	\$0
Quarries & Borrow Areas	\$0	\$0	\$0	\$0
Underground Openings				N/A
Process Ponds	\$0	\$0	\$0	\$0
Heaps	\$0	\$0	\$0	\$0
Waste Rock Dumps	\$0	\$0	\$0	\$0
Landfills	\$0	\$0	\$0	\$0
Tailings	\$0	\$0	\$0	\$0
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Yards, Etc.	\$0	\$0	\$0	\$0
Drainage & Sediment Control	\$0	\$0	\$0	\$0
Generic Material Hauling	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "B"	\$568	\$216	\$1,620	\$2,404
C. Detoxification/Water Treatment/Disposal of Wastes**	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Process Ponds/Sludge				\$0
Heaps				\$0
Dumps (Waste & Landfill)				\$0
Tailings				\$0
Surplus Water Disposal				\$0
Monitoring				\$0
Miscellaneous				\$0
Solid Waste - On Site	\$0	\$0	N/A	\$0
Solid Waste - Off Site				\$0
Hazardous Materials				\$0
Hydrocarbon Contaminated Soils	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "C"	\$0	\$0	\$0	\$0
D. Structure, Equipment and Facility Removal, and Misc.	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Other Demolition	\$0	\$0	\$0	\$0
Equipment Removal	\$0	\$0	\$0	\$0
Fence Removal	\$0	\$0	\$0	\$0
Fence Installation	\$0	\$0	\$0	\$0
Culvert Removal	\$0	\$0	N/A	\$0
Pipe Removal	\$0	\$0	N/A	\$0
Powerline Removal	\$0			\$0
Transformer Removal	\$0			\$0
Rip-rap, rock lining, gabions	\$0	\$0	\$0	\$0
Other Misc. Costs	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "D"	\$0	\$0	\$0	\$0
E. Monitoring	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Reclamation Monitoring and Maintenance	\$4,145	\$502	\$162	\$4,809
Ground and Surface Water Monitoring	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Subtotal "E"	\$4,145	\$502	\$162	\$4,809
F. Construction Management & Support	Labor	Equipment ⁽²⁾	Materials	Total
Construction Management	\$0	\$0	N/A	\$0
Construction Support	\$0	\$0	\$0	\$0
Road Maintenance	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "F"	\$0	\$0	\$0	\$0
Subtotal Operational & Maintenance Costs	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials ⁽³⁾	Total
Subtotal A through F	\$14,016	\$11,209	\$1,797	\$27,022

** Other Operator supplied costs - additional documentation required.

**Closure Cost Estimate
Cost Summary**

**Project Name: Rhyolite Ridge Exploration Project
Project Date: September 2018
Model Version: Version 1.4.1
File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm**

Indirect Costs		Include?	Total		
1. Engineering, Design and Construction (ED&C) Plan (7)			N/A		
2. Contingency (8)			N/A		
3. Insurance (9)	\$210		\$210		
4. Performance Bond (10)			N/A		
5. Contractor Profit (11)			\$2,702		
6. Contract Administration (12)			\$2,702		
7. Government Indirect Cost (13)			\$567		
Subtotal Add-On Costs			\$6,181		
Total Indirect Costs as % of Direct Cost			23%		
GRAND TOTAL			\$33,203		
Administrative Cost Rates (%)					
		Cost Ranges for Indirect Cost Percentages			
		<=	<=	<=	>
1. Engineering, Design and Construction (ED&C) Plan (7)		\$1,000,000	\$25,000,000	\$25,000,000	Small Plan
	Variable Rate	8%	6%	4%	0%
2. Contingency (8)		\$500,000	\$5,000,000	\$50,000,000	Small Plan
	Variable Rate	10%	8%	6%	0%
3. Insurance (9)		1.5% of labor costs			
4. Bond (10)		3.0% of the O&M costs if O&M costs are >\$100,000			
5. Contractor Profit (11)		10% of the O&M costs			
		<=	<=	<=	>
6. Contract Administration (12)		\$1,000,000	\$25,000,000	\$25,000,000	
	Variable Rate	10%	8%	6%	
Government Indirect Cost (13)		21% of contract administration			

RECLAMATION COST ESTIMATION SUMMARY SHEET FOOTNOTES

1. Federal construction contracts require Davis-Bacon wage rates for contracts over \$2,000. Wage rate estimates may include base pay, payroll loading.
2. The reclamation cost estimate must include the estimated plugging cost of at least one drill hole for each active drill rig in the project area. Where the
3. Miscellaneous items should be itemized on accompanying worksheets.
4. Fluid management should be calculated only when mineral processing activities are involved. Fluid management represents the costs of maintaining proper
5. Handling of hazardous materials includes the cost of decontaminating, neutralizing, disposing, treating and/or isolating all hazardous materials used, produced.
6. Any mitigation measures required in the Plan of Operations must be included in the reclamation cost estimate. Mitigation may include measures to avoid,
7. Engineering, design and construction (ED&C) plans are often necessary to provide details on the reclamation needed to contract for the required work. To
8. A contingency cost is included in the reclamation cost estimation to cover unforeseen cost elements. Calculate the contingency cost as a percentage of the
9. Insurance premiums are calculated at 1.5% of the total labor costs. Enter the premium amount if liability insurance is not included in the itemized unit costs.
10. Federal construction contracts exceeding \$100,000 require both a performance and a payment bond (Miller Act, 40 USC 270et seq.). Each bond premium is
11. For Federal construction contracts, use 10% of estimated O&M cost for the contractor's profit.
12. To estimate the contract administration cost, use 6 to 10% of the operational and maintenance (O&M) cost. Calculate the contract administration cost as a
13. Government indirect cost rate is 21% of the contract administration costs.

Reclamation Quantity Summary

TOTALS	4,956 \$	7,856	\$	-	\$	-	4.46 \$	-	\$	2,404 \$	10,260
Average Costs	per CY	\$1.58	per CY		per CY		per acre		\$0.00		\$2,300

**Closure Cost Estimate
Exploration**

Project Name: Rhyolite Ridge Exploration Project- Notice or Exploration
Date of Submittal: September 2018
File Name: 2017 SRCE_Version_1_4_1_017_NV.xdsm
Model Version: Version 1.4.1
Cost Data: User Data
Cost Data File: SRCE_Cost_Data_File_1_12_Sld_2018.xdsm
Cost Estimate Type: Surety
Cost Basis: S. Nevada Notice Level

Exploration - Cost Summary				
	Labor	Equipment	Materials	Totals
Hole Abandonment Costs	\$383	\$132		\$527
Trench Backfilling Costs	\$1,835	\$2,841		\$4,676
Subtotal Earthworks	\$2,218	\$2,973		\$5,203
Trench Revegetation Costs	\$100	\$36		\$73
TOTALS	\$2,318	\$3,011	\$85	\$5,414

Exploration Drillhole Abandonment - User Input

Facility Description		Hole Plugging								
	Description (required)	ID Code	Hole Type (select)	Diameter in.	Total Number of Holes	Max Holes Open at One Time	Casing to Remove ft	Average Depth of Hole ⁽¹⁾ ft bgs	Depth to Water ft bgs	Hole Plug Method (select)
1	shallow borehole drilling		Rotary	8.0	11.0	1.0	0.0	100.0	100.0	Grout + Backfill

Notes:

1. If core holes are pre-drilled, use length of hole below pre-drilled length
2. If Top Plug is selected, assumes maximum 1/2hr laborer time to place plug and backfill with cuttings/soil (including move-to/set up time).

Exploration Trenches - User Input

Facility Description		Trench Parameters					Backfill				Revegetation		
	Description (required)	Trench Length ft	Trench Depth ft	Trench Bottom Width ft	Trench Slope Angle degrees	Additional Hrs for Walk-in ⁽¹⁾ hr	Backfill Material (select)	Cut Material Type (select)	Backfilling Fleet (select)	Seed Mix (select)	Mulch (select)	Fertilizer (select)	
1	Test pit excavation (24) 20-foot long trenches	480	20.0	3.0	85.0	1.0	1	Alluvium	Small Dozer	Mix 3	None	None	

Notes:

1. Include one-way hours necessary to walk equipment in from drop-off point to work area
2. Material Types are used for density correction based on material densities in Caterpillar Performance Handbook material density table

Exploration Drillhole Abandonment

	Description (required)	Volume of depth ft3	Hole Plugging Material (1)	Total Grout Volume (2) cy	Total Cuttings Volume cu yd	Total Top Soil Volume (3,4) cu yd	Total Drills Abandon, Hours (5,7) hrs	Casing Material Labor Cost (5) \$	Casing Removal Equipment Cost \$	Plugging Labor Cost \$	Plugging Equipment Cost \$	Plugging Material Cost (2,3) \$	Top Soil Material Cost (6,7) \$	Total Cost (8,7) \$
1	Shallow borehole drilling	0.350	Cuttings	0.00	0.39	0.32	3	\$0	\$0	\$383	\$132	\$0	\$12	\$527
					0.39	0.32	3	\$0	\$0	\$383	\$132	\$0	\$12	\$527

[illegible]

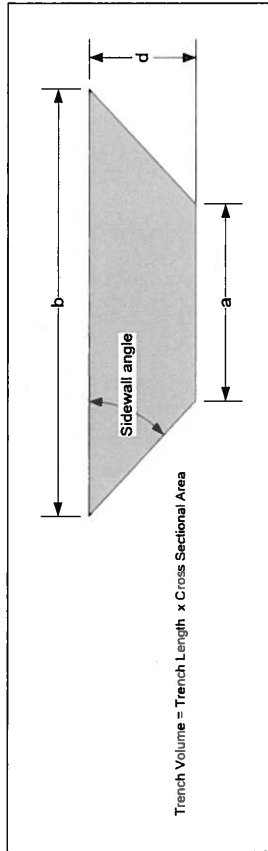
Closure Cost Estimate Exploration

Project Name: Rhyolite Ridge Exploration Project- Notice or Exploration
 Date of Submittal: September 2018
 File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration - Cost Summary				
	Labor	Equipment	Materials	Totals
Hole Abandonment Costs	\$383	\$132	\$12	\$527
Trench Backfilling Costs	\$1,835	\$2,841		\$4,676
Subtotal Earthworks	\$2,218	\$2,973	\$12	\$5,203
Trench Revegetation Costs	\$100	\$38	\$73	\$211
TOTALS	\$2,318	\$3,011	\$85	\$5,414

Exploration Trenches - Calculations

Exploration Trench Volume Calculation



Dozing & Ripping/Scarifying Calculations

Dozing: Dozing distance = 1/2 trench length or 400 ft (max push) whichever is less
 Assumes flat push (grade correction factor = 1)

Revegetation: 10 ft added to trench width to account for revegetation under spoil pile

Exploration Trenches - Backfill/Regrading Costs

Productivity = Dozer Productivity x Grade Correction x Density Correction x Operator (0.75) x Material x Visibility x Job Efficiency (0.83)

Description (required)	Trench Backfill Volume	Dozer Push Distance	Equipment Productivity	Dozing Material	Density Correction	Backfilling Fleet	Corrected Hourly Productivity	Total Dozer Hours	Trench Backfill Labor Cost	Trench Backfill Equipment Cost	Total Trench Backfill Cost
1 Test pit excavation (24) 20-foot long trenches	2.196	240	184	1.00	0.78	D6R	90	25	\$1,835	\$2,841	\$4,676
	LCY (BCY*30%)										
	2.196								\$1,835	\$2,841	\$4,676

Exploration Trenches - Revegetation Costs

Description (required)	Surface Area	Revegetation Labor Cost	Revegetation Equipment Cost	Revegetation Material Cost	Total Revegetation Cost
1 Test pit excavation (24) 20-foot long trenches	0.20	\$100	\$38	\$73	\$211
	0.20	\$100	\$38	\$73	\$211

Exploration Roads & Pads - Cost Summary				
	Labour	Equipment	Materials	Totals
Grading Costs	\$1,248	\$1,192	N/A	\$3,180
Construction Cost	\$0	\$0	N/A	\$0
Ripping/Sealing Cost	\$0	\$0	N/A	\$0
Subtotal Earthworks	\$1,248	\$1,192		\$3,180
	\$468	\$178		
Revegetation Cost	\$1,716	\$2,110	\$1,547	\$2,193
			\$1,547	\$5,373
TOTALS				

Exploration Roads & Pads - User Input																	
Facility Description																	
You must fill in ALL green cells and relevant blue cells in this section for each road																	
Physical (I) - MANDATORY																	
			Underlying Ground Slope %	Ungrazed Slope %	Cut Slope %	Drill Pad Length	Road Width	Number of Drill Pads	Drill Pad Width	Drill Pad Length	Drill Pad Volume	Slope Replacement %	Slope Percent	Disturbed Area (if calculated) acres	Regulate	User Overrides	Growth Media
	Description (required)	IO Code															
1	Planned drill sites (including HWY sites)		10.0	1.3	35.0	1,200	6.0	12	35.0	62	100	100%	100%				Slope from Road to Growth Media Distance ft
2	Planned test pit clearing area		10.0	1.3	35.0	720	0.0	24	0	0	30	100%	0%				Media Thickness in
3	Planned overland travel		0.0	0.0	0.0	15,100	6.0	0	0	0	0	0%	0%				Slope from Road to Growth Media Distance ft

Notes:

1. All Physical parameters must be input even if manual overrides for volume or area are used.
2. Slope replacement refers to the percentage of cut volume replaced during regridding.
3. If Slope from facility to borrow source is ≥ 20 , downhill travel time may be underestimated due to limitation of uphill travel time curves and downhill speed tables from CAT Handbook (see Productivity Sheet).
4. Sumo volume will be applied to all roads on slopes $<20\%$. On slopes $>20\%$ and width (i.e. cut volume) should be adequate to account for sumo volume.

Exploration Roads & Pads - User Input (cont.)															
You must fill in ALL green cells and relevant blue cells in this section for each road															
			Grading				Growth Media				Revegetation				
Description (required)			Regrade Material Condition (select)	Cut Material Type (select)	Recontouring Equipment Fleet (select)	Additional Hrs for Walk-In ⁽¹⁾	Growth Media Material Type (select)	Growth Media Placement Equipment Fleet (select)	Maximum Fleet Size (use comment)	Additional Hrs for Walk-In ⁽¹⁾	Seed Mix (select)	Mulch (select)	Fertilizer (select)	Scattymix/ Riprap 7 (select)	Riprap Fleet (select)
1	Planned drill sites (including MW sites)		1	U.S. - broken	Small Dozer	1.0					Mix 3	None	None	No	
2	Planned pits and staging area		1	U.S. - broken	Small Dozer	1.0					Mix 3	None	None	No	
3	Planned road paving											None	None	No	

Notes:

1. Include one-way hours necessary to walk equipment in from drop-off point to work area
2. Material Types are used for density correction based on material densities in Caterpillar Performance Handbook material density table

**Closure Cost Estimate
Expl. Roads & Pads**

Project Name: Rhyolite Ridge Exploration Project- Notice of Exploration
 Date of Submittal: September 2018
 File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Sld_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary				
	Labor	Equipment	Materials	Totals
Grading Costs	\$1,248	\$1,932	N/A	\$3,180
Cover Placement Cost	\$0	\$0	N/A	\$0
Ripping/Scarifying Cost	\$0	\$0	N/A	\$0
Subtotal Earthworks	\$1,248	\$1,932		\$3,180
Revegetation Cost	\$468	\$1,716	\$1,547	\$3,731
TOTALS	\$1,716	\$2,110	\$1,547	\$5,373

Exploration Roads & Pads - Regrading Costs									
	Description (required)	Total Road Length ft	Drill Pad Length ft	Regrading Volume cy	Recounting Fleet	Equipment Productivity cy/hr	Total Equipment Hours hr	Total Labor Cost \$	Total Equipment Cost \$
1	Planned drill sites (including MW site)	0	1,200	2,382	D6R	93	13	\$954	\$1,477
2	Planned test pit working area	0	720	380	D6R	93	4	\$294	\$455
3	Planned overland travel	15,100	0					\$0	\$0
		15,100	1,920	2,762			17	\$1,248	\$1,932
									\$3,180

(1) Includes walk-in time based on distance and travel speed (see Productivity sheet for speeds)

Exploration Roads & Pads - Growth Media Costs									
	Description (required)	Growth Media Volume cy	Growth Media Replacement Fleet	Fleet Productivity LCY/hr	Number of Trucks/Scrapers	Total Fleet Hours	Total Labor Cost \$	Total Equipment Cost \$	Total Growth Media Cost \$
1	Planned drill sites (including MW site)						\$0	\$0	\$0
2	Planned test pit working area						\$0	\$0	\$0
3	Planned overland travel						\$0	\$0	\$0

Exploration Roads & Pads - Scarifying/Revegetation Costs									
	Description (required)	Surface Area acres	Ripping/Scarifying Fleet	Ripping Hours hrs	Ripping Labor Costs \$	Total Ripping Costs \$	Revegetation Labor Cost \$	Revegetation Equipment Cost \$	Total Revegetation Cost \$
1	Planned drill sites (including MW site)	1.60					\$160	\$61	\$802
2	Planned test pit working area	0.58					\$100	\$38	\$211
3	Planned overland travel	2.08					\$208	\$79	\$755
		4.26			\$0	\$0	\$468	\$178	\$1,547
									\$2,193

**Closure Cost Estimate
Well Abandonment**

Project Name: Rhyolite Ridge Exploration Project- Notice or Exploration
 Date of Submittal: September 2018
 File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Well Abandonment			
	Labor	Equipment	Totals
Production, Dewatering, Infiltration Wells	\$0	\$0	\$0
Monitoring Wells	\$383	\$132	\$518
TOTALS	\$383	\$132	\$518

Monitoring Well Closure

	Description (required)	ID Code	Number of Holes	Casing Diam in	Average Depth ft bgs	Top of Screen ⁽¹⁾ ft bgs	Hole Plug Method (select)	Casing Volume per ft ³ ft3	GROUT Volume/ Well ^(2,3) cy	Cement Volume per Hole ⁽⁴⁾ cy	Best Backfill Volume per Hole ⁽⁵⁾ cy	Total Grouting Holes hr	Total Inert Media Hole hr	GROUT + Cement Labor Cost ⁽⁶⁾ \$	GROUT + Cement Equip ⁽⁷⁾ Cost ⁽⁷⁾ \$	Best Material Equip ⁽⁷⁾ Cost ⁽⁷⁾ \$	Total Cost \$
1	GWIPiezometer		1	4.0	380	300	Cement Pl	0.090		0.08	0.77	3.0		\$0	\$0	\$132	\$518
														\$0	\$0	\$132	\$518

Wells abandoned per NAC 534.420 with bentonite grout placed to 50 feet above the top of the screen (see note 1).

- (1) Assumes top of screen is at or above the static water level (in unconfined aquifers) or the depth of first water encountered (in confined aquifers).
 (2) Assumes 25% loss to formation for grouting
 (3) Grouting only required to 50' (15.24m) above the top of screen because monitor wells are constructed with a seal in the annular space.
 (4) Assumes top 20' (6m) plugged with cement.
 (5) Assumes hole plugged with inert material (cuttings or alluvium) above grout up to cement surface plug.
 (6) See Productivity Sheet for hourly production. Minimum 1 hr per hole + fixed hours per hole for move and setup (see Productivity Sheet).
 (7) See Productivity Sheet for hourly production. Minimum 1 hr per hole.

Notes:

10/9/2018
 Rhyolite Ridge Exploration
 NV's End User - All Rights Reserved

Closure Cost Estimate Monitoring

Project Name: Rhyolite Ridge Exploration Project- Notice or Exploration

Date of Submittal: September 2018

File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm

Model Version: Version 1.4.1

Cost Data: User Data

Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm

Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Reclamation Monitoring & Maintenance - Cost Summary				
	Labor	Equipment	Lab & Materials	Totals
Revegetation Maintenance	\$45	\$17	\$162	\$224
Erosion Maintenance	\$0	\$0	N/A	\$0
Reclamation Monitoring	\$4,100	\$485	N/A	\$4,585
Subtotal Reclamation Monitoring	\$4,145	\$502	\$162	\$4,809
Water Quality Monitoring	\$0	\$0	\$0	\$0
TOTAL MONITORING	\$4,145	\$502	\$162	\$4,809

Reclamation Maintenance								
Description	Total Revegetation Surface Area (1,2) acres	% Area Requiring Reseeding	Seed Mix (select)	Area Requiring Reseeding acres	Seed \$/acres	Labor \$/acres	Equipment \$/acres	Totals \$
Revegetation Maintenance	4	10%	Mix 3	0.4	\$363.00	\$100.00	\$38.00	
Labor								\$45
Equipment								\$17
Materials								\$162
Cost/Acre								\$501
							Subtotal	\$224

Notes: 1) Surface area is NOT the same as footprint disturbance area typically used for permitting purposes.

	Total Volume Growth Media cy	% Volume Requiring Maintenance	Average Growth Media Placement Cost \$/CY	Volume Requiring Replacement cy		Labor (assume: 25%) \$/acres	Equipment (assume: 75%) \$/acres	Total \$
Erosion Maintenance	0		\$0.00	0		\$0.00	\$0.00	\$0

Notes:

Reclamation Monitoring					
Description	Hrs/Day	Days/Year	Number of Years	Rate \$/hr	
Field Work					
Field Geologist/Engineer				\$149.49	\$0
Range Scientist	6	1	3	\$136.68	\$2,460
Reporting					
Field Geologist/Engineer				\$149.49	\$0
Range Scientist	4	1	3	\$136.68	\$1,640
					Subtotal \$4,100
Travel					
	Hrs/Trip	Trips/Year	Years	Truck Cost \$/hr	
Travel	6	1	3	\$26.97	\$485
					Subtotal \$485
					Total Reclamation Monitoring \$4,585

Notes:

**Closure Cost Estimate
Labor Rates**

Project Name: Rhyolite Ridge Exploration Project- Notice of Exploration
 Date of Submittal: September 2018
 File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Color Code Key	
User Input - Direct Input	Direct Input
User Input - Pull Down List	Pull Down Selection
Program Constant (can override)	Alternate Input
Program Calculated Value	Locked Cell - Formula or Reference

ZONE ADJUSTMENTS

Cost Basis/Project Region	S. Nevada Notice	Clark, Esmeralda, Lincoln and Nye Counties
Power Equipment Operators	>80 miles	\$3.50
Truck Drivers	>70 miles	\$3.50
Laborers	>50 miles	\$3.25

INDIRECT COSTS

Unemployment (%)	3.00%
Retirement/SS/Medicare (%)	7.65%
Workman's Compensation (%)	0.675

Other Indirects

State Payroll Tax (13),(15),(17),(18)

Total Other Indirects 0.00%

HOURLY LABOR RATE TABLE

EQUIPMENT TYPE (1) OR JOB DESCRIPTION	Labor Group	Base Rate (\$/hr)	Zone Adjustment (\$/hr)	Hourly Wage (\$/hr)	Fringe (\$/hr)	Retirement/ Medicare (\$/hr)	Unemployment Insurance (\$/hr)	Workman's Compensation (\$/hr)	Other Indirect Costs (\$/hr)	Total (\$/hr)
Equipment Operators (\$/hr) (2)										
Bulldozers										
D6R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D6R w/ Winch	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D7R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D8R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D9R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D10R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D11R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
Wheeled Dozers										
824G					\$0.00					
834G					\$0.00					
844					\$0.00					
854G					\$0.00					
Motor Graders										
120H	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
14G/H	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
16G/H	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
24M					\$0.00					
Track Excavators										
312C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
320C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
325C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
330C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
345B	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
365BL					\$0.00					
365BL	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
Scrapers										
631G	Group 15	\$59.23	\$3.50	\$62.73	\$0.00	\$1.88	\$4.80	\$4.70	\$0.00	\$74.12
637G	Group 15	\$59.23	\$3.50	\$62.73	\$0.00	\$1.88	\$4.80	\$4.70	\$0.00	\$74.12
Wheeled Loaders										
924G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
928G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
950G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
966G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
972G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
980G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
988G	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
990					\$0.00					
992G	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
994D					\$0.00					
L2350					\$0.00					
Shovels										
PC2000					\$0.00					
PC3000					\$0.00					
PC4000					\$0.00					
PC5500					\$0.00					
PC8000					\$0.00					
Hydraulic Hammers										
H-120 (fits 325)										
H-160 (fits 345)										
H-160 (fits 365/385)										
Demolition Shears										
S340 (fits 322/325/330)										
S365 (fits 330/345)										
S390 (fits 365/385)										
Demolition Grapples										
G315 (fits 322/325)										
G320 (fits 325/330)										
G330 (fits 345/365)										

**Closure Cost Estimate
Labor Rates**

Project Name: Rhyolite Ridge Exploration Project- Notice of Exploration
 Date of Submittal: September 2018
 File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Color Code Key	
User Input - Direct Input	Direct Input
User Input - Pull Down List	Pull Down Selection
Program Constant (can override)	Alternate Input
Program Calculated Value	Locked Cell - Formula or Reference

ZONE ADJUSTMENTS

Cost Basis/Project Region	S. Nevada Notice	Clark, Esmeralda, Lincoln and Nye Counties
Power Equipment Operators	>60 miles	\$3.50
Truck Drivers	>70 miles	\$3.50
Laborers	>50 miles	\$3.25

INDIRECT COSTS

Unemployment (%)	3.00%
Retirement/SS/Medicare (%)	7.65%
Workman's Compensation (%)	0.075

Other Indirects

State Payroll Tax (13),(15),(17),(18)	
Total Other Indirects	0.00%

HOURLY LABOR RATE TABLE

Other Equipment									
420D 4WD Backhoe	Group 4	\$58.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00
428D 4WD Backhoe	Group 4	\$58.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00
CS533E Vibratory Roller	Group 4	\$58.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00
CS633E Vibratory Roller				\$0.00					
CP533E Sheepsfoot Compactor				\$0.00					
CP633E Sheepsfoot Compactor				\$0.00					
Light Truck - 1.5 Ton				\$0.00					
Supervisor's Truck				\$0.00					
Flatbed Truck				\$0.00					
Air Compressor + tools	Group 1	\$55.67	\$3.50	\$59.17	\$0.00	\$1.78	\$4.53	\$4.44	\$0.00
Welding Equipment	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00
Heavy Duty Drill Rig	Group 2	\$56.62	\$3.50	\$60.12	\$0.00	\$1.80	\$4.60	\$4.51	\$0.00
Pump (plugging) Drill Rig	Group 2	\$56.62	\$3.50	\$60.12	\$0.00	\$1.80	\$4.60	\$4.51	\$0.00
Concrete Pump				\$0.00					
Gas Engine Vibrator	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00
Generator 5KW				\$0.00					
HDEP Welder (pipe or liner)				\$0.00					
5 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00
20 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00
50 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00
120 Ton Crane				\$0.00					

NOTES:

(1) Equipment Type:	Caterpillar model or equivalent, LeTourneau
(2) Equipment Operator Source:	D-B NV160034 01/05/2018
(3) Zone Basis:	From Las Vegas City Hall

Truck Drivers (\$/hr) (4)

725	Group 4	\$46.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00
730	Group 4	\$46.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00
735	Group 4	\$46.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00
740	Group 4	\$46.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00
769D	Group 4	\$46.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00
773E				\$0.00					
777D	Group 4	\$46.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00
785C				\$0.00					
793C				\$0.00					
797B				\$0.00					
613E (5,000 gal) Water Wagon	Group 3	\$46.44	\$3.50	\$49.94	\$0.00	\$1.50	\$3.82	\$3.75	\$0.00
621E (8,000 gal) Water Wagon	Group 4	\$46.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00
777D Water Truck				\$0.00					
785C Water Truck				\$0.00					
Dump Truck (10-12 yd3)	Group 2	\$46.23	\$3.50	\$49.73	\$0.00	\$1.49	\$3.80	\$3.73	\$0.00

NOTES:

(4) Truck Driver Source:	D-B NV16003401/05/2018
(5) Zone Basis:	From Las Vegas City Hall

Color Code Key	
User Input - Direct Input	Direct Input
User Input - Pull Down List	Pull Down Selection
Program Constant (can override)	Alternate Input
Program Calculated Value	Locked Cell - Formula or Reference

Cost Basis/Project Region	S. Nevada Notice	Clark, Esmeralda, Lincoln and Nye Counties
Power Equipment Operators	>60 miles	\$3.50
Truck Drivers	>70 miles	\$3.50
Laborers	>50 miles	\$3.25

Unemployment (%)	3.00%
Retirement/SS/Medicare (%)	7.65%
Workman's Compensation (%)	0.075

State Payroll Tax (13),(15),(17),(18)	
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Total Other Indirects	0.00%
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Laborers (\$/hr) (6,7)

General Laborer	Group 1	\$42.94	\$3.25	\$46.19	\$0.00	\$1.39	\$3.53	\$3.45	\$0.00	\$54.57
Skilled Laborer	Group 3	\$43.25	\$3.25	\$46.50	\$0.00	\$1.40	\$3.56	\$3.49	\$0.00	\$54.94
Driller's Helper	Group 2	\$43.15	\$3.25	\$46.40	\$0.00	\$1.39	\$3.55	\$3.48	\$0.00	\$54.82
Rodmen (reinforcing concrete)	Group 4	\$43.34	\$3.25	\$46.59	\$0.00	\$1.40	\$3.56	\$3.49	\$0.00	\$55.05
Cement finisher	Group 4	\$43.34	\$3.25	\$46.59	\$0.00	\$1.40	\$3.56	\$3.49	\$0.00	\$55.05
Carpenter		\$48.95	\$3.25	\$52.20	\$0.00	\$1.57	\$3.99	\$3.92	\$0.00	\$61.67

(6) Laborer Source:	0-8 SUNV2011-001 10/1/2010
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(7) Carpenter Source:	D-8 GUNV2011-001 10/1/2010
(8) Zone Description:	From Las Vegas City Hall

(8) Zone Basis: From Las Vegas City Hall

Management and Technical Labor	
Manager	
Supervisor	
Technician	
Operator	
Worker	

[illegible]

(9) Project Manager	R.S.Means 2018 Q2 (01/31/2020) Total Incl. G&P=10% Adjusted for Elio- NV
(9) Foreman Source	R.S.Means 2018 Q2 (01/31/2020) Total Incl.G&P=10% Adjusted for Elio- NV
(9) Technical Labor Source	SRK Consulting 2010 (Total Incl. G&P=10%) Adjusted for Zone, Tax and Ins.
Other Labor Source	
Other Labor Source	
†Additional User Markup	
(These are added by the user to the base rate to account for site-specific conditions or corporate requirements)	

2018 MOB/DEMOB using R.S. MEANS and SRCE equipment and DAVIS-BACON wages									
blue font is for project specific user input		Miles from Washoe County Courthouse to project, one way		300					
		Miles from equipment rental yard to project, one way (9)		283					
Enter Project Name		Hours travel time @ 55 MPH		5.15					
Equipment	Mobilization \$/hour (1)	\$ Flat Rate load & unload (2)	\$/hour Deadhead (empty return cost) (3)	Disassembly and assembly (4)	Permit cost \$ (5)	Pilot car costs	# of units	One Way Mob Cost	Total Mob and Demob Cost
Bulldozers									
D6R	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -	1	\$ 1,113	\$ 2,225
D7R	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 466	1	\$ 1,933	\$ 3,866
D8R	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -
D9R	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -
D10R	\$ 150	\$ 150	\$ 150	\$ 65,940	\$ 25	\$ 974		\$ -	\$ -
D11R (two transports) (7)	\$ 150	\$ 150	\$ 150	\$ 139,848	\$ 25	\$ 649		\$ -	\$ -
Motor Graders									
14G/H	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -
16G/H	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 325		\$ -	\$ -
Track Excavators									
320C	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -
325C	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -
345B	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -
385BL	\$ 150	\$ 150	\$ 150	\$ 46,260	\$ 25	\$ 649		\$ -	\$ -
Scrapers									
631G	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -
637G PP	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -
Wheeled Loaders									
928G	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -
966G	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -
972G	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -
988G	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 325		\$ -	\$ -
992G (two transports) (7)	\$ 150	\$ 150	\$ 150	\$ 76,440	\$ 25	\$ 649		\$ -	\$ -
Hydraulic Hammers									
H-120 (fits 325) no charge, mobilize with mach	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -
H-160 (fits 345) no charge, mobilize with mach	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -
H-180 (fits 365/385) no charge, mobilize with mach	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -
Other Equipment									
420D 4WD Backhoe	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -
CS563E Vibratory Roller	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -
Light Truck - 1.5 Ton	\$ 63	\$ 63	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -
Supervisor's Truck	\$ 56	\$ 56	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -
Air Compressor + tools	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -
Welding Equipment	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -
Heavy Duty Drill Rig	\$ 392	\$ 392	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -
Pump (plugging) Drill Rig	\$ 392	\$ 392	\$ -	\$ -	\$ -	\$ -	1	\$ 2,408	\$ 4,816
Concrete Pump	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -
Gas Engine Vibrator	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -
Generator 5KW	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -
HDEP Welder (pipe or liner)	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -
5 Ton Crane Truck	\$ 94	\$ 94	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -
25 Ton Crane	\$ 135	\$ 135	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -
Trucks									
725	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -
740	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 325		\$ -	\$ -
769D	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 649		\$ -	\$ -
777D (two transports) (8)	\$ 150	\$ 150	\$ 150	\$ 73,452	\$ 25	\$ 974		\$ -	\$ -
613E (5,000 gal) Water Wagon	\$ 150	\$ 150	\$ 150	\$ -	\$ -	\$ -		\$ -	\$ -
621E (8,000 gal) Water Wagon	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 649		\$ -	\$ -
Dump Truck (10-12 yd ³)	\$ 112	\$ 112	\$ 112	\$ -	\$ -	\$ -		\$ -	\$ -
Miscellaneous									
Equipment for dry hole abandonment (420D 4W)	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -
Pilot car (Light Truck)	\$ 56	\$ 56	\$ 56	\$ -	\$ -	\$ -		\$ -	\$ -
Truck Tractor + Lowbed Trailer 75 ton	\$ 150	\$ 150	\$ 150	\$ -	\$ -	\$ -		\$ -	\$ -
Truck Tractor + Flatbed Trailer 40 ton	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -
Light Truck + Flatbed Trailer 25 ton	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -
								3	\$ 10,908

Footnotes and explanations of assumptions

- (1) The sum of the cost of equipment from either the SRCE or RSM equipment tab plus Davis-Bacon labor tab
- (2) Assumes minimum of 30 minutes load and secure and 30 minutes unsecure and unload machine.
- (3) No "Deadhead" (empty) charge for Mob up to 50 miles. More than 50 miles the cost of deadhead same rate as loaded miles.
- (4) Only large equipment requires disassembly for transport. Includes cost of mechanic + mechanic's truck + crane operator + crane.
- (5) Nevada Dept. of Transportation overdimensional permits are \$25 per trip or \$60 per year.
- (6) Sum of mobilization plus all ancillary costs for one way loaded and return empty.
- (7) Two transports are required but the second transport does not need pilot cars or permits or a heavy duty trailer.
- (8) Two transports required with both requiring full complement of pilot cars and permits.
- (9) For large mining operations, mobilization may be required from more than one location. For example, the Elko yard may not have four 631 scrapers. Additional equipment may need to mobilize from Reno, Las Vegas, or Salt Lake City. Input the further distance here.
- (10) Pilot Car costs based on SRCE light truck costs and Davis-Bacon wages
- (11) SRCE costs based on July 2018 vendor quotes.
- (12) RS Means costs based on R.S. Means Heavy Construction Cost Data, 2018, Q2
- (13) Davis Bacon wages based on 2018 determination.

**N-97202 — Rhyolite Ridge Exploration Project
Cultural and Paleontological Resource Conditions**

Paradigm Minerals USA Corp. (the Operator) is informed that a Bureau of Land Management (BLM) Tonopah Field Office (TFO) archaeologist has conducted a records review of the location of N-97202. The Operator is informed that disturbance must be contained to the areas depicted on the Notice map dated September 24, 2018. Disturbance outside of the areas depicted may cause unnecessary or undue degradation to a historic property and in accordance with 43 CFR 3809.421, the Operator is legally required to prevent unnecessary or undue degradation to historic properties. If the Operator knowingly causes unnecessary or undue degradation to historic properties, the Operator is subject to penalties under 43 CFR 3809.604, 43 CFR 3809.605, 43 CFR 3809.700, and the Archaeological Resources Protection Act (ARPA). The Operator is informed that the following conditions for cultural resources—including the procedures in place in the event cultural resources are encountered during the course of project activities—apply.

Cultural Resources

If historic or prehistoric artifacts or features are discovered during project activities, operations in the immediate area shall cease, and the resources shall be left intact. The Operator shall take measures to protect the discovered artifacts from further disturbance by employees or contractors. Additionally, the Operator shall notify the Tonopah Field Manager at (775) 482-7800 so that the resource may be evaluated. The BLM will, as appropriate, evaluate the significance of the find within 10 working days. The Operator shall not proceed with potentially disturbing activities until authorized to do so by the BLM.

Pursuant to 43 CFR 10.4(g), the holder of this Notice must notify the authorized officer, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary objects, and/or sacred objects of cultural patrimony (as identified at 43 CFR 10.2). Furthermore, pursuant to 43 CFR 10.4(c) and (d), the Operator must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

Paleontological Resources

Paleontological resources constitute a fragile and non-renewable scientific record of the history of life on earth. Although no paleontological resources are known or identified in the immediate area, this project may have an unintended adverse effect on such resources. The Operator should note that fossils are not part of the mineral estate. Paleontological resources are protected by the Paleontological Resources Protection Act (OPLA-PRP: Omnibus Public Land Management Act of 2009 Paleontological Resources Preservation Subtitle 123 Stat. 1172, 16 U.S.C. 470aaa et seq.) which establishes criminal and civil penalties. The Operator should also be aware that if paleontological resources are found in direct association with cultural resources, then such occurrences are subject to Archaeological Resource Protection Act (ARPA: 43 CFR 7.4, 7.14, 7.15, 7.16) provisions. OPLA-PRP requires that the nature and location of paleontological resources on public lands be kept confidential. If paleontological resources are discovered, the Operator must cease operations in the vicinity of the discovery and ensure adequate protection to the discovery, then notify the BLM immediately, by telephone, with written confirmation to follow. Notification should be made to Tonopah Field Office Manager, Tonopah Field Office, 1553 South Main Street, Tonopah, NV, 89049, (775-482-7800). No activity in the vicinity of the discovery should resume until the Operator has been issued a Notice to Proceed by the Authorized Officer.

**N-97202 — Rhyolite Ridge Exploration Project
Other Resource Conditions**

Land and Realty

- Right of Way and RS2477 Roads in Sections 19, 20, (N-54403) and 20 (N-54402)
- Geothermal Lease (N-56087) in Section 20
- Use existing roads and trails

Wildlife, Wild Horse and Burros, and T&E Animals

- Raptor nesting habitat near project area, no known eagle nests within .5 miles of proposed drill sites. Closest known raptor nest is .4 miles from closest drill site and is geographically isolated. No negative impacts to raptors or golden eagles anticipated
- Project falls within mapped year round mule deer and bighorn sheep habitat. Lambing habitat is outside project area. No negative impacts anticipated
- Avoid land clearing activities during the migratory bird season, if unavoidable, Ensure clearance surveys are conducted
- Ensure construction of pits are in a fashion that prevents the consumption of toxic fluids by wildlife and allows for safe egress/ingress.
- The project is in the Silver Peak HMA and the nearest wild equids observed during the 2018 aerial survey were 1.1 miles southeast of the drill sites. The nearest water sources are the Cove Canyon Well and Cave Spring. Wild horses, burros, and mules may pass through the project location, though not likely during active drilling
- Located in the Silver Peak Allotment
- **Use Salt Desert Shrub Seed** mix with when reseeding

Recreation and public access

- Numerous UTV and offroad clubs use the main access for recreational use
- Do not block or close accesses on existing roads

GUIDELINES FOR OPERATIONS CONDUCTED UNDER A "NOTICE"

(Not all are appropriate for all areas)

1. For any given project area, the maximum allowable surface disturbance under a "Notice" is five acres. Any activity that results in excavation, compaction, powdering, or erosion of the original ground surface, is considered disturbance and must be reclaimed. This may include the blading or rutting of existing roads, the development of a rutted surface during cross-country travel, and drilling or trenching. Please contact this office if you expect to exceed a total disturbance of five acres; submittal of a Plan of Operations may be necessary.
2. In areas where more than one operator has been or will be conducting operations, we suggest that each operator document their portion of the disturbance to assist in future reclamation accountability. This should be done by submitting to BLM a map showing the existing disturbance and the proposed new disturbance, and indicating the time periods (if known) during which past disturbance occurred. Reclamation of disturbance done under this "Notice" is the responsibility of the claimant and includes liability for reclamation not satisfactorily completed by the operator.
3. Disturbance to drainages, including blading or filling, should be avoided. Where a dry wash offers the only feasible access to a site, no blading of the wash should be done. No disturbance should occur within 100 feet of active drainages, springs or seeps. Drainage crossings should neither obstruct the channel nor result in increased erosion or sedimentation.
4. Within the Tonopah Field Office planning area there are certain effective actions that are considered to be critical to reclamation success and eventual closure for mineral development projects conducted on public lands. Earthwork should blend disturbed areas back into pre-disturbance topography, i.e., reclamation of roads cut into hill sides should involve pulling excavated material back up into the road cuts so as to closely approximate the original hillside. Material should consist of a mix of medium coarse to fine sand size materials, avoid "bug dust". Seed beds should be rough and consist of alluvial material or "top soil" spread over the top of the disturbed areas (high salt content may be a problem in some areas). The use of fertilizer is discouraged. Use the appropriate seed mix. To verify the proper seed mix, contact the Tonopah Field Office prior to re-seeding. All seeds must be tested for noxious, poisonous, or prohibited plant species, and the test result submitted to and approved by the BLM, unless certified "weed free" seed is procured. Seeding should be completed in the late fall before the first snowfall. Successful revegetation consists of the establishment of a self-sustaining desirable plant community.
5. All operations, including casual use, must comply with all applicable Federal and State laws and regulations concerning cultural resources. According to the Surface Management Regulations (43 CFR 3809.2-2), operators shall not knowingly destroy, disturb or alter cultural or paleontological resources on Federal lands. You must avoid historic features, such as trash scatters, adits, foundations, old equipment, buildings, etc. If such resources might be altered or destroyed by your actions, you must cease your exploration activities, leaving the resource intact, and immediately notify the Tonopah Field Office Manager at (775) 482-7800 so that the resource may be evaluated.
- 5a. If historic or pre-historic artifacts are discovered during project activities, operations in the immediate area shall cease, leaving the resource intact. The operator shall take measures to protect the discovered artifacts from further disturbance by mine employees or contractors. Notify the Tonopah Field Office Manager at (775) 482-7800 so that the resource may be evaluated. The BLM will, as appropriate, evaluate the significance of the find within 10 working days. The operator shall not proceed with potentially disturbing activities until authorized to do so by the BLM. Pursuant to 43 CFR 10.4(g), the holder of this "Notice" must notify the authorized officer, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary objects, sacred

objects of cultural patrimony (as identified at 43 CFR 10.2). Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

6. Migratory birds are protected by the Migratory Bird Treaty Act. Surface disturbing activities during the migratory bird nesting season (March 1 through July 31) may destroy the eggs or young of ground-nesting migratory birds. Avoidance of nesting sites would prevent violation of this Act, as would conducting surface disturbing activities outside the nesting season. Further information on preventing violation of the Act can be obtained by contacting the U.S. Fish and Wildlife Service Regional Office, Reno, Nevada, at (775) 861-6300.
7. There is a possibility of sensitive bat habitat in the area of your proposed operation. Avoid disturbing historic workings - adits or shafts.
8. Scientifically significant paleontological resources located on lands administered by the BLM must be left in place and their locations reported to the Tonopah Field Office as soon as possible. All vertebrate fossils, as well as some invertebrates, are included in this category. Your assistance in these efforts will help increase the paleontological database on public lands.
9. Trash must be hauled to a landfill permitted by the Nevada Division of Environmental Protection (NDEP) rather than dumped, buried, and/or burned on-site. All operators must comply with applicable Federal and State laws dealing with the storage and disposal of chemicals, petroleum, petroleum products, and Resource Conservation Recovery Act (RCRA) Subtitle D solid and RCRA Subtitle C hazardous wastes. Under no circumstances may chemicals, petroleum, petroleum products or RCRA Subtitle C hazardous wastes be disposed of in solid waste disposal areas within the project area without written approval of the NDEP.
10. Occupational Safety and Health Standards (OSHA)

1910.141(c)(1)(i) Toilet Facilities

Except as otherwise indicated in this paragraph (c)(1)(i), toilet facilities, in toilet rooms separate for each sex, shall be provided in all places of employment in accordance with table J-1 of this section. The number of facilities to be provided for each sex shall be based on the number of employees of that sex for whom the facilities are furnished. Where toilet rooms will be occupied by no more than one person at a time, can be locked from the inside, and contain at least one water closet, separate toilet rooms for each sex need not be provided. Where such single-occupancy rooms have more than one toilet facility, only one such facility in each toilet room shall be counted for the purpose of table J-1.

Number of employees	Minimum number of water closets ¹
1 to 15	1
16 to 35	2
36 to 55	3
56 to 80	4
81 to 110	5
111 to 150	6
Over 150	(²)

¹Where toilet facilities will not be used by women, urinals may be provided instead of water closets, except that the number of water closets in such cases shall not be reduced to less than 2/3 of the minimum specified.

²1 additional fixture for each additional 40 employees.

1910.141(c)(1)(ii)

The requirements of paragraph (c)(1)(i) of this section do not apply to mobile crews or to normally unattended work locations so long as employees working at these locations have transportation immediately available to nearby toilet facilities which meet the other requirements of this subparagraph.

11. When a fence is cut to allow access to a site, a temporary gate must be installed to prevent livestock from passing through the opening. The fence should be repaired to its original condition or better as soon as possible. Permission from the owner of the fence must be obtained.
12. Destruction or felling of trees is to be avoided whenever possible. Partial delimbing is the preferred alternative. Aspen, bristlecone, limber pine and cottonwood are protected and should not be disturbed.
13. Use of water for drilling or mining purposes must conform to State of Nevada regulations. Artificial water impoundments used to fill water trucks on public lands must be pre-approved.
14. Fluids or solution used or encountered in the drilling process may be discharged to the environment only after other practical methods of fluid control (i.e., sumps, tanks, etc.) have been exhausted. If solutions must be discharged to the environment, they must be controlled in such a manner that the discharge does not cause erosion or channeling and is contaminant and sediment free. Alternatives to these fluid management practices must be approved by this office.
15. It is your responsibility to bear the cost of any necessary restoration or reestablishment activity of affected survey monument(s). Correspondingly, in the course of any accepted surface disturbance activity when Public Land Survey System Monuments/Cadastral corners or accessories that may or have been subject to obliteration, destruction, or damage, it will be your responsibility to protect and preserve the monumentation. Further clarification can be found in Nevada BLM's Instruction Memorandum No. NV-2007-003.
16. The following precautionary measures should be taken to prevent wildland fires. In the event your operations should start a fire, you could be held liable for all suppression costs.
 1. All vehicles should carry fire extinguishers.
 2. Adequate fire fighting equipment i.e. shovel, pulaski, extinguisher(s), and/or an ample water supply should be kept at the drill site(s).
 3. Vehicle catalytic converters and the vehicle undercarriage should be inspected often and cleaned of all brush and grass debris.
 4. When conducting welding operations, they should be conducted in an area free from or mostly free from vegetation. An ample water supply and shovel should be on hand to extinguish any fires created from the sparks. Extra personnel should be on site to watch out for fires created by welding sparks.
 5. Report wildland fires immediately to the Central Nevada Interagency Dispatch Center at (775) 623-1555.
17. Noxious weeds can readily invade disturbed areas associated with exploration projects. Operators are responsible for: 1) identifying noxious weeds in project area (booklets and pamphlets are available from this office), 2) excluding noxious weeds from disturbed areas until reclamation has been accepted, 3) insuring all equipment is "weed free" before traveling to and from project areas so that noxious weeds are not spread to new locations. When noxious weeds are encountered in project areas, documentation of their location and extent should be provided to the BLM as soon as possible.

Operators must obtain approval from the authorized officer prior to any herbicide application. Please contact the Tonopah Field Station's noxious weed program lead if you have questions or comments on the information contained in this Guideline.

18. To maintain access for other members of the public, drilling activities are not allowed on existing roads and trails. Drill pads surface disturbance must be more than 20 feet from the travel surface of existing roads and trails. "*Existing roads and trails*" are travel routes for vehicles that you are not required to reclaim.
19. Please provide Tonopah Field Office with at least 72 hour notice before any surface disturbing activity is started. Call 775-482-7800.

Form 1842-1
(September 2006)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

INFORMATION ON TAKING APPEALS TO THE INTERIOR BOARD OF LAND APPEALS

DO NOT APPEAL UNLESS

1. This decision is adverse to you,
AND
2. You believe it is incorrect

IF YOU APPEAL, THE FOLLOWING PROCEDURES MUST BE FOLLOWED

1. NOTICE OF APPEAL.....

A person who wishes to appeal to the Interior Board of Land Appeals must file in the office of the officer who made the decision (not the Interior Board of Land Appeals) a notice that he wishes to appeal. A person served with the decision being appealed must transmit the *Notice of Appeal* in time for it to be filed in the office where it is required to be filed within 30 days after the date of service. If a decision is published in the FEDERAL REGISTER, a person not served with the decision must transmit a *Notice of Appeal* in time for it to be filed within 30 days after the date of publication (43 CFR 4.411 and 4.413).

2. WHERE TO FILE

NOTICE OF APPEAL.....

Bureau of Land Management, Tonopah Field Office, P. O. Box 911, 1553 S. Main Street, Tonopah, NV 89049-0911

WITH COPY TO
SOLICITOR...

Regional Solicitor, Pacific Southwest Region, U.S. Department of the Interior, 2800 Cottage Way, Room E-2753, Sacramento, CA 95825-1890

3. STATEMENT OF REASONS

Within 30 days after filing the *Notice of Appeal*, file a complete statement of the reasons why you are appealing. This must be filed with the United States Department of the Interior, Office of Hearings and Appeals, Interior Board of Land Appeals, 801 N. Quincy Street, MS 300-QC, Arlington, Virginia 22203. If you fully stated your reasons for appealing when filing the *Notice of Appeal*, no additional statement is necessary (43 CFR 4.412 and 4.413).

WITH COPY TO
SOLICITOR.....

Regional Solicitor, Pacific Southwest Region, U.S. Department of the Interior, 2800 Cottage Way, Room E-2753, Sacramento, CA 95825-1890

4. ADVERSE PARTIES.....

Within 15 days after each document is filed, each adverse party named in the decision and the Regional Solicitor or Field Solicitor having jurisdiction over the State in which the appeal arose must be served with a copy of: (a) the *Notice of Appeal*, (b) the Statement of Reasons, and (c) any other documents filed (43 CFR 4.413).

5. PROOF OF SERVICE.....

Within 15 days after any document is served on an adverse party, file proof of that service with the United States Department of the Interior, Office of Hearings and Appeals, Interior Board of Land Appeals, 801 N. Quincy Street, MS 300-QC, Arlington, Virginia 22203. This may consist of a certified or registered mail "Return Receipt Card" signed by the adverse party (43 CFR 4.401(c)).

6. REQUEST FOR STAY.....

Except where program-specific regulations place this decision in full force and effect or provide for an automatic stay, the decision becomes effective upon the expiration of the time allowed for filing an appeal unless a petition for a stay is timely filed together with a *Notice of Appeal* (43 CFR 4.21). If you wish to file a petition for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the Interior Board of Land Appeals, the petition for a stay must accompany your *Notice of Appeal* (43 CFR 4.21 or 43 CFR 2801.10 or 43 CFR 2881.10). A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the *Notice of Appeal* and Petition for a Stay **must** also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the appropriate Office of the Solicitor (43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Standards for Obtaining a Stay. Except as otherwise provided by law or other pertinent regulations, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards: (1) the relative harm to the parties if the stay is granted or denied, (2) the likelihood of the appellant's success on the merits, (3) the likelihood of immediate and irreparable harm if the stay is not granted, and (4) whether the public interest favors granting the stay.

Unless these procedures are followed, your appeal will be subject to dismissal (43 CFR 4.402). Be certain that **all** communications are identified by serial number of the case being appealed.

NOTE: A document is not filed until it is actually received in the proper office (43 CFR 4.401(a)). See 43 CFR Part 4, Subpart B for general rules relating to procedures and practice involving appeals.

(Continued on page 2)

43 CFR SUBPART 1821--GENERAL INFORMATION

Sec. 1821.10 Where are BLM offices located? (a) In addition to the Headquarters Office in Washington, D.C. and seven national level support and service centers, BLM operates 12 State Offices each having several subsidiary offices called Field Offices. The addresses of the State Offices can be found in the most recent edition of 43 CFR 1821.10. The State Office geographical areas of jurisdiction are as follows:

STATE OFFICES AND AREAS OF JURISDICTION:

Alaska State Office ----- Alaska
Arizona State Office ----- Arizona
California State Office ----- California
Colorado State Office ----- Colorado
Eastern States Office ----- Arkansas, Iowa, Louisiana, Minnesota, Missouri
and, all States east of the Mississippi River
Idaho State Office ----- Idaho
Montana State Office ----- Montana, North Dakota and South Dakota
Nevada State Office ----- Nevada
New Mexico State Office ---- New Mexico, Kansas, Oklahoma and Texas
Oregon State Office ----- Oregon and Washington
Utah State Office ----- Utah
Wyoming State Office ----- Wyoming and Nebraska

(b) A list of the names, addresses, and geographical areas of jurisdiction of all Field Offices of the Bureau of Land Management can be obtained at the above addresses or any office of the Bureau of Land Management, including the Washington Office, Bureau of Land Management, 1849 C Street, NW, Washington, DC 20240.

(Form 1842-1, September 2006)

ATTACHMENT D



December 5, 2019

Via email and regular mail

Mr. Perry Wickham
Bureau of Land Management
Tonopah Field Office
P.O. Box 911 (1553 South Main Street)
Tonopah, Nevada 89049-0911

Re: NVN-097202 Ioneer USA Corporation - Rhyolite Ridge Exploration Project

Dear Mr. Wickham:

By this correspondence, Ioneer USA Corporation (Ioneer) notifies the Tonopah Office of the Bureau of Land Management (BLM) that Ioneer has ceased all operations under the above-mentioned Notice. Ioneer understands that BLM can order reclamation under 43 C.F.R. Section 3809.335b. This cessation notice is being provided pursuant to 43 C.F.R. Section 3809.332.

Please call me if you have any questions regarding this correspondence.

Regards,

A handwritten signature in blue ink that reads "Matt Weaver".

Matt Weaver
Senior Vice President Operations



ATTACHMENT E



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
Tonopah Field Office
P.O. Box 911 (1553 South Main Street)
Tonopah, Nevada 89049
Phone: 775-482-7800 Fax: 775-482-7810
www.blm.gov/nevada

In Reply Refer To:
N-97202
3809 (NVB0200)

DEC 06 2019

CERTIFIED MAIL - RETURN RECEIPT REQUESTED 7019 0700 0000 6677 7571

DECISION

Ioneer USA Corp.	:	
Matt Weaver, Senior VP	:	Surface Management
241 Ridge St., #210	:	
Reno, NV 89501	:	

RELINQUISHMENT OF NOTICES ACCEPTED – NOTICES TERMINATED, RECLAMATION REQUIRED

On December 5, 2019, the Bureau of Land Management (BLM) received notification from Ioneer USA Corp. (Ioneer) of its intent to relinquish under BLM's regulations at 43 CFR 3809 Notice, N-97202, located in Esmeralda County, Nevada in Township 1 South, Range 37 East, sections 19, 20, 28, 29 & 32, Mount Diablo Base & Meridian. The BLM accepts Ioneer's relinquishment and the notices are hereby terminated as of this date, December 5, 2019. Under this status, all surface disturbance and mining related activities, except reclamation, are not authorized and must cease as required by 43 CFR 3809.335(b). Any unauthorized activities continuing after the termination date will be subject to enforcement actions.

If you file a new Notice or Plan of Operations, the requirements of the 43 CFR 3809 regulations, including, but not limited to, environmental review of Plans of Operations under the National Environmental Policy Act, and full cost bonding under 43 CFR 3809.500 is required for both Notice- or Plan-level operations, prior to beginning or resuming operations.

Reclamation Required

Within 30 days of receiving this decision, you must commence the reclamation required by your Notice on file with the BLM. All reclamation, including required equipment removal, earthwork, borehole plugging, monitor well(s) abandonment pursuant to Nevada State standards, sump and well pad removal, overland travel, and road removal, repair, and reseedling must be completed within 90 days of this decision. The BLM will continue to monitor your progress in meeting your reclamation obligations, including the success of the revegetation in the disturbed area. The BLM will inform you when all reclamation standards have been met and whether your financial guarantee amount may be reduced or released. Should you fail to commence reclamation within 30 days of receipt of this decision or fail to complete necessary reclamation within 90 days of

receipt of this decision, the BLM may initiate forfeiture of all or part of your financial guarantee as provided for under 43 CFR 3809.336(b) and 43 CFR 3809.595. You may also be subject to enforcement actions under 43 CFR 3809.601.

Reclamation may be deferred, if you file a new Notice or Plan of Operations for the project area within 30 days. If determined to be complete, BLM will defer this reclamation required under this decision until the notice is accepted or the plan is approved.

Appeal of the Decision

If you are adversely affected by this decision, you may request that the BLM Nevada State Director review this decision. If you request a State Director Review, the request must be received in the BLM Nevada State Office at 1340 Financial Blvd., Reno, Nevada 89502, no later than 30 calendar days after you receive or have been notified of this decision. The request for State Director Review must be filed in accordance with the provisions in 43 CFR 3809.805. This decision will remain in effect while the State Director Review is pending, unless a stay (suspension) is granted by the State Director. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

If the State Director does not make a decision on your request for review of this decision within 21 days of receipt of the request, you should consider the request declined and you may appeal this decision to the Interior Board of Land Appeals (IBLA). You may contact the BLM Nevada State Office to determine when the BLM received the request for State Director Review. You have 30 days from the end of the 21-day period in which to file your Notice of Appeal with this office at P.O. Box 911, 1553 S. Main St, Tonopah, NV 89049, which we will forward to IBLA.

If you wish to bypass a State Director Review, this decision may be appealed directly to the IBLA in accordance with the regulations at 43 CFR 3809.801(a) (1). Your Notice of Appeal must be filed in this office at P.O. Box 911, 1553 S. Main St, Tonopah, NV 89049, within 30 days from receipt of this decision. As the appellant, you have the burden of showing that the decision appealed from is in error. Enclosed is BLM Form 1842-1 that contains information on taking appeals to the IBLA.

This decision will remain in effect while the IBLA reviews the case, unless a stay is granted by the IBLA. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Request for a Stay

If you wish to file a petition (request) pursuant to regulations 43 CFR 4.21 for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by IBLA, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of this notice of appeal and petition for a stay must also be submitted to each party named in the decision and to the IBLA and to the appropriate Office of the Solicitor (see 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal must show sufficient justification based on the following standards:

1. The relative harm to parties if the stay is granted or denied.
2. The likelihood of the appellant's success on the merits.
3. The likelihood of immediate and irreparable harm if the stay is not granted.
4. Whether the public interest favors granting the stay.

If you have any questions, please contact Jonah Blustain, Assistant Field Manager, Non-Renewable Minerals, at (775) 482-7843.



Perry B. Wickham
Field Manager

Enclosures

cc: BLM Nevada State Office
Branch of Mineral Resources (Solids)

Form 1842-1
(September 2006)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

INFORMATION ON TAKING APPEALS TO THE INTERIOR BOARD OF LAND APPEALS

DO NOT APPEAL UNLESS

1. This decision is adverse to you,
AND
2. You believe it is incorrect

IF YOU APPEAL, THE FOLLOWING PROCEDURES MUST BE FOLLOWED

1. NOTICE OF APPEAL.....	A person who wishes to appeal to the Interior Board of Land Appeals must file in the office of the officer who made the decision (not the Interior Board of Land Appeals) a notice that he wishes to appeal. A person served with the decision being appealed must transmit the <i>Notice of Appeal</i> in time for it to be filed in the office where it is required to be filed within 30 days after the date of service. If a decision is published in the FEDERAL REGISTER, a person not served with the decision must transmit a <i>Notice of Appeal</i> in time for it to be filed within 30 days after the date of publication (43 CFR 4.411 and 4.413).
2. WHERE TO FILE	
NOTICE OF APPEAL.....	Bureau of Land Management, Tonopah Field Office, P. O. Box 911, 1553 S. Main Street, Tonopah, NV 89049-0911
WITH COPY TO SOLICITOR...	Regional Solicitor, Pacific Southwest Region, U.S. Department of the Interior, 2800 Cottage Way, Room E-2753, Sacramento, CA 95825-1890
3. STATEMENT OF REASONS	Within 30 days after filing the <i>Notice of Appeal</i> , file a complete statement of the reasons why you are appealing. This must be filed with the United States Department of the Interior, Office of Hearings and Appeals, Interior Board of Land Appeals, 801 N. Quincy Street, MS 300-QC, Arlington, Virginia 22203. If you fully stated your reasons for appealing when filing the <i>Notice of Appeal</i> , no additional statement is necessary (43 CFR 4.412 and 4.413).
WITH COPY TO SOLICITOR.....	Regional Solicitor, Pacific Southwest Region, U.S. Department of the Interior, 2800 Cottage Way, Room E-2753, Sacramento, CA 95825-1890
4. ADVERSE PARTIES.....	Within 15 days after each document is filed, each adverse party named in the decision and the Regional Solicitor or Field Solicitor having jurisdiction over the State in which the appeal arose must be served with a copy of: (a) the <i>Notice of Appeal</i> , (b) the Statement of Reasons, and (c) any other documents filed (43 CFR 4.413).
5. PROOF OF SERVICE.....	Within 15 days after any document is served on an adverse party, file proof of that service with the United States Department of the Interior, Office of Hearings and Appeals, Interior Board of Land Appeals, 801 N. Quincy Street, MS 300-QC, Arlington, Virginia 22203. This may consist of a certified or registered mail "Return Receipt Card" signed by the adverse party (43 CFR 4.401(c)).
6. REQUEST FOR STAY.....	<p>Except where program-specific regulations place this decision in full force and effect or provide for an automatic stay, the decision becomes effective upon the expiration of the time allowed for filing an appeal unless a petition for a stay is timely filed together with a <i>Notice of Appeal</i> (43 CFR 4.21). If you wish to file a petition for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the Interior Board of Land Appeals, the petition for a stay must accompany your <i>Notice of Appeal</i> (43 CFR 4.21 or 43 CFR 2801.10 or 43 CFR 2881.10). A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the <i>Notice of Appeal</i> and Petition for a Stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the appropriate Office of the Solicitor (43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.</p> <p>Standards for Obtaining a Stay. Except as otherwise provided by law or other pertinent regulations, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards: (1) the relative harm to the parties if the stay is granted or denied, (2) the likelihood of the appellant's success on the merits, (3) the likelihood of immediate and irreparable harm if the stay is not granted, and (4) whether the public interest favors granting the stay.</p>

Unless these procedures are followed, your appeal will be subject to dismissal (43 CFR 4.402). Be certain that all communications are identified by serial number of the case being appealed.

NOTE: A document is not filed until it is actually received in the proper office (43 CFR 4.401(a)). See 43 CFR Part 4, Subpart B for general rules relating to procedures and practice involving appeals.

(Continued on page 2)

43 CFR SUBPART 1821--GENERAL INFORMATION

Sec. 1821.10 Where are BLM offices located? (a) In addition to the Headquarters Office in Washington, D.C. and seven national level support and service centers, BLM operates 12 State Offices each having several subsidiary offices called Field Offices. The addresses of the State Offices can be found in the most recent edition of 43 CFR 1821.10. The State Office geographical areas of jurisdiction are as follows:

STATE OFFICES AND AREAS OF JURISDICTION:

Alaska State Office ----- Alaska
Arizona State Office ----- Arizona
California State Office ----- California
Colorado State Office ----- Colorado
Eastern States Office ----- Arkansas, Iowa, Louisiana, Minnesota, Missouri
and, all States east of the Mississippi River
Idaho State Office ----- Idaho
Montana State Office ----- Montana, North Dakota and South Dakota
Nevada State Office ----- Nevada
New Mexico State Office ---- New Mexico, Kansas, Oklahoma and Texas
Oregon State Office ----- Oregon and Washington
Utah State Office ----- Utah
Wyoming State Office ----- Wyoming and Nebraska

(b) A list of the names, addresses, and geographical areas of jurisdiction of all Field Offices of the Bureau of Land Management can be obtained at the above addresses or any office of the Bureau of Land Management, including the Washington Office, Bureau of Land Management, 1849 C Street, NW, Washington, DC 20240.

(Form 1842-1, September 2006)

ATTACHMENT F



October 1, 2018

RECEIVED-MAILROOM

2018 OCT -2 P 1:45

BUREAU OF LAND MANAGEMENT
TONOPAH FIELD OFFICE

via Federal Express (773370345047)

Mr. Timothy Coward
Bureau of Land Management
Tonopah Field Office
P.O. Box 911 (1553 South Main Street)
Tonopah, Nevada 89049-0911

RE: Paradigm Minerals USA Corp., New Notice for South Infill Exploration Project and Request for Closure of Notice NVN-095045 for South Lithium Basin Exploration Project

Dear Mr. Coward:

On behalf of Paradigm Minerals USA Corp. (PMU), EM Strategies, Inc. (EM Strategies) is submitting a new Notice for exploration activities proposed at the South Infill Exploration Project (Project). PMU met with the Bureau of Land Management Tonopah Field Office (BLM) in late September 2018 and the BLM suggested that (1) PMU close the South Lithium Basin Notice NVN-095045 and (2) submit a new Notice to include portions of surface disturbance previously authorized under NVN-095045 which PMU wants to keep active and new locations of planned surface disturbance. With this submittal, PMU is following the BLM's suggested approach and is requesting the closure of Notice NVN-095045 for authorized activities at the South Lithium Basin Exploration Project. Figure 2 shows the total as-built surface disturbance conducted at the South Lithium Basin Project, which are being requested for release to close NVN-095945. Under the South Infill Notice, PMU is including 2.01 acres of as-built surface disturbance conducted under Notice NVN-095045 which PMU wants to keep active in addition to 2.45 acres of planned new locations of surface disturbance.

Please provide EM Strategies with a courtesy copy of all correspondence for the Project. If you have any questions or need additional information, please contact our office at (775) 753-9496.

Sincerely,

EM Strategies, Inc.

A handwritten signature in blue ink, appearing to read "K Sweet", is written over a horizontal line.

Kaitlin C. Sweet
Elko Manager

Enclosure

cc: Mr. Matt Weaver - PMU (w/enclosure via email: mweaver@globalgeo.com.au)



Notice

South Infill Exploration Project

October 1, 2018

Paradigm Minerals USA Corp. (PMU) intends to conduct exploration activities at the South Infill Exploration Project (Project) located in Section 34, Township 1 South, Range 37 East (T1S, R37E), and Section 3, T2S, R37E, Mount Diablo Base and Meridian in Esmeralda County, Nevada (Project Area). PMU met with the Bureau of Land Management Tonopah Field Office (BLM) in late September 2018. The BLM suggested PMU (1) close the South Lithium Basin Notice NVN-095045 and (2) submit a new Notice to include portions of surface disturbance previously approved under NVN-095045, which PMU wants to keep active, and new locations of planned surface disturbance. PMU has followed the suggested approach outlined by the BLM regarding the closure of Notice NVN-095045. Under this Notice, PMU plans to incorporate and keep active 2.01 acres of as-built surface disturbance approved under Notice NVN-095045 in addition to 2.45 acres of planned new locations of surface disturbance for a total of **4.46 acres**. The locations of authorized as-built surface disturbance and planned new locations of surface disturbance are shown on Figure 1, Appendix 1. Figure 2 shows the total as-built surface disturbance conducted at the South Lithium Basin Project which are being requested for release to close NVN-095045. PMU files this Notice pursuant to the provisions of 43 Code of Federal Regulations (CFR) 3809.21 and 3809.301.

1. Name of Operator: Paradigm Minerals USA Corp.

Name of Corporate Contact: Matt Weaver, Senior Vice President

Mailing Address: Paradigm Minerals USA Corp.
241 Ridge Street, Suite 210
Reno, Nevada 89501

Tax Identification Number:

Owners of Mining Claims: Paradigm Minerals Arizona Corp.
241 Ridge Street, Suite 210
Reno, Nevada 89501

2. Bureau of Land Management Serial Numbers and Names of Claims on Which Disturbance will Occur:

Claim Name	NMC Number
SLB 5	NMC1117364
SLB 6	NMC1117365
SLB 7	NMC1117366
SLB 8	NMC1117367
SLB 9	NMC1117368
SLB 10	NMC1117369
SLB 11	NMC1117370

Claim Name	NMC Number
SLB 17	NMC1117376
SLB 18	NMC1117377
SLB 19	NMC1117378
SLB 20	NMC1117379
SLB 23	NMC1117382
SLB 24	NMC1117383
SLB 26	NMC1117385

SOUTH INFILL EXPLORATION PROJECT
ESMERALDA COUNTY, NEVADAPARADIGM MINERALS USA CORP.
NOTICE

Claim Name	NMC Number
SLB 12	NMC1117371
SLB 13	NMC1117372
SLB 14	NMC1117373
SLB 15	NMC1117374
SLB 16	NMC1117375

Claim Name	NMC Number
SLB 28	NMC1117387
SLB 30	NMC1117389
SLB 32	NMC1117391
SLB 33	NMC1117392
SLB 38	NMC1117397

3. Location of Proposed Activities: The Project is located approximately 15 air miles from Dyer, Nevada (Figure 1), and can be reached from Fish Lake Valley by turning east from State Highway 264 on to the Mineral Ridge county road. The Project Area is located on the Baldy Peak 7 ½ minute United States Geological Survey (USGS) Quadrangle map. The location is shown on Figure 1, Appendix 1.
4. Existing Disturbance in the Project Area: There are several existing tracks and trails located within the Project Area, as shown on Figure 1. PMU conducted approximately 2.01 acres of surface disturbance under the approved exploration activities under Notice NVN-095045, which are now included in this Notice.
5. Project Description: PMU plans to conduct exploration drilling at the Project from up to 28 constructed drill sites accessed via existing travel routes and segments of constructed road. Approximately 2,844 linear feet of exploration roads will be constructed with the approximate running width of 12 feet. Drill sites will be constructed with an average working area of 50 feet long by 50 feet wide. Sumps approximately 20 feet long by ten feet wide by 6.75 feet deep will be excavated within the drill site disturbance to collect drill cuttings and manage fluids. PMU will construct one water bladder laydown area with the approximate dimensions of 61 feet long by 50 feet wide. PMU has developed two ground water monitoring wells within the surface disturbance of as-built drill sites constructed under Notice NVN-095045. The ground water monitoring wells were completed with four-inch diameter steel casing up to 250 feet deep. PMU's as-built and planned exploration activities are shown on Figure 1.

Exploration drilling will be conducted with a reverse-circulation (RC) rig to drill holes to a maximum depth of 1,000 feet. Water for the Project will be obtained by a private contractor. The drill crew and geologists will use 4-wheel drive vehicles to access the site. Support vehicles and equipment for the exploration drilling activities include pick-up trucks, pipe trucks, and water trucks.

The depth to the water table in the areas of proposed drilling is unknown; however, for the bond calculation assumptions, 100 feet below ground surface is assumed. If ground water is encountered, the hole will be plugged pursuant to Nevada Administrative Code (NAC) 534.420.

6. Approximate Surface Disturbance: The following specifics apply to the Project:

As-Built Surface Disturbance Conducted under NVN-095045 to be included in the Notice

SOUTH INFILL EXPLORATION PROJECT
ESMERALDA COUNTY, NEVADA

PARADIGM MINERALS USA CORP.
NOTICE

- Approximately 4,917 linear feet of constructed roads with disturbance width of 12 feet = **1.36 acres** and
- Eight drill sites (including sumps) approximate dimensions of 61 feet long by 58 feet wide = **0.65 acre**.

Total As-Built Surface Disturbance Conducted under NVN-095045 to be included in the Notice = 2.01 acres

Planned Surface Disturbance

- Approximately 2,844 linear feet of constructed roads with a running width of 12 feet = **0.78 acre**;
- Twenty-eight drill sites (including sumps) constructed with the approximate dimensions of 50 feet long by 50 feet wide = **1.60 acres**; and
- One water bladder laydown area constructed with the approximate dimensions of 61 feet long by 50 feet wide = **0.07 acre**.

Total Planned Surface Disturbance = 2.45 acres

Total As-Built (from Notice NVN-095045) and Planned Surface Disturbance = 4.46 acres

7. Schedule of Activities: PMU anticipates that Project activities will commence as early as October 2018. Reclamation activities will likely be completed in the Summer of 2020; however, revegetation activities are limited by the time of year during which they can be effectively implemented. Site conditions or yearly climatic variations may require that this schedule be modified to achieve revegetation success. Once a site or road is no longer needed for exploration, the site will be reclaimed.
8. Measures Taken to Prevent Unnecessary or Undue Degradation: Operations will be conducted consistent with 43 CFR 3809.415 and 3809.420.
 - Existing access routes and constructed roads will be used.
 - Only nontoxic fluids will be used in the drilling process.
 - PMU will not knowingly disturb, alter, injure, or destroy any scientifically important paleontological deposits; or any historical or archaeological site, structure, building, or object. If PMU discovers any cultural or paleontological resource that might be altered or destroyed by operations, the discovery will be left intact and reported to the authorized BLM officer.
 - Any survey monuments, witness corners, or reference monuments will be protected to the extent economically and technically feasible.

SOUTH INFILL EXPLORATION PROJECT
ESMERALDA COUNTY, NEVADA

PARADIGM MINERALS USA CORP.
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- Public safety will be maintained throughout the life of the Project. All equipment will be maintained in a safe and orderly manner.
 - All solid wastes will be removed from the Project Area and disposed of in a state, federal, or local designated site.
 - Hazardous substances utilized at the Project will include diesel fuel, gasoline, and lubricating grease. Approximately 100 gallons of diesel fuel and gasoline will be stored in fuel delivery systems on the drill rig and support vehicles. Approximately 50 pounds of lubricating grease will be stored on the drill rig or transported by drill trucks. In the event that hazardous or regulated materials were spilled, measures will be taken to control the spill and the BLM and the Nevada Division of Environmental Protection (NDEP) will be notified as required. Any hazardous substance spills will be cleaned immediately, and any resulting waste will be transferred off site in accordance with all applicable local, state, and federal regulations. Contract drillers will maintain spill kits on site for use in case of a spill.
 - PMU will comply with all applicable state and federal fire laws and regulations and all reasonable measures will be taken to prevent and suppress fires in the Project Area.
 - Best Management Practices (BMPs) for sediment control will be utilized during construction, operation, and reclamation to minimize sedimentation from disturbed areas. Sumps could include, but not be limited to, fabric or certified weed-free straw bale filter fences, siltation or filter berms, and downgradient drainage channels in order to prevent unnecessary or undue degradation to the environment.
 - All drill holes will be plugged in accordance with NAC 534.4369 and 534.4371. If ground water is encountered, the hole will be plugged pursuant to NAC 534.420.
 - All drill holes will be abandoned in accordance with the State of Nevada Regulations for Water Well and Related Drilling (NAC/NRS Chapter 534).
 - All reasonable steps will be taken to minimize the introduction of noxious weeds and to limit the spread of any existing infestations.
9. Reclamation: Reclamation will be completed to the standards described in 43 CFR 3809.420. Exploration roads and drill sites will be regraded to the natural contour and slope of the surrounding topography and to the pre-Project condition. All spoil piles from sediment trap construction will be stockpiled at drill site locations and recontoured at such time as the drill site will no longer be used. All earthwork will be completed with a Caterpillar Backhoe, or equivalent equipment. Reclamation of the piezometer/ground water monitoring wells will be cutting the casing to ground surface, plugging the drill hole with cement, and reclaiming the typical-sized drill pad and sump. The regraded and/or ripped areas will then be seeded with a BLM-approved seed mix, at the appropriate time of year for optimum seed sprouting and plant growth. The seeding will be completed with a manual broadcaster and raked. The reclaimed surfaces will be left in a textured or rough condition (small humps, pits, etc.). The broadcast seed application

rate will vary based on the shrub, forb, and grass species selected. Native seed will be used when available. Only certified weed-free seed will be used for reclamation seeding. Post-reclamation maintenance will consist of remedial dirt work and reseeding, if required.

Site monitoring for stability and revegetation success will be conducted once a year for at least three years, during the spring or fall, or until attainment of the revegetation standards established in the *Nevada Guidelines for Successful Revegetation for the Nevada Division of Environmental Protection, the Bureau of Land Management, and the USDA Forest Service* (Instruction Memorandum #NV 99-013).

10. Reclamation Cost Estimate: The reclamation cost estimate (Appendix 2), as required by 43 CFR 3809.552, is attached to this Notice. The Standardized Reclamation Cost Estimator, Version 1.4.1, Build 017b including 2018 cost data, with the 2018 Mobilization/Demobilization worksheet was used to estimate reclamation costs for the Project.

The following assumptions have been made in calculating the reclamation cost estimate:

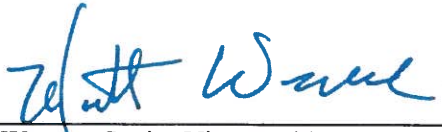
- Approximately 2.01 acres of as-built surface disturbance authorized under Notice NVN-095045 will be recontoured and seeded.
- Approximately 2,844 linear feet of road with a running width of 12 feet will be recontoured and seeded.
- Twenty-eight constructed drill sites approximately at 50 feet long by 50 feet wide will be recontoured and seeded.
- One water bladder laydown area with the approximate dimensions of 61 feet long by 50 feet wide will be recontoured and seeded.
- Twenty-eight constructed sumps, approximately 20 feet long by ten feet wide and 6.75 feet deep will be backfilled, recontoured, and seeded.
- Abandonment of two ground water monitoring wells with a casing diameter of four inches and average depth of 250 feet.
- A Caterpillar Backhoe, excavator, dozer, or equivalent equipment, will be used for all reclamation earthwork including recontouring and scarifying sumps. The disturbed area will be seeded by a manual broadcast method and raked.
- The total estimated reclamation cost for the total planned disturbance contained in this Notice is **\$35,953.00**.

SOUTH INFILL EXPLORATION PROJECT
ESMERALDA COUNTY, NEVADA

PARADIGM MINERALS USA CORP.
NOTICE

11. Signature Page

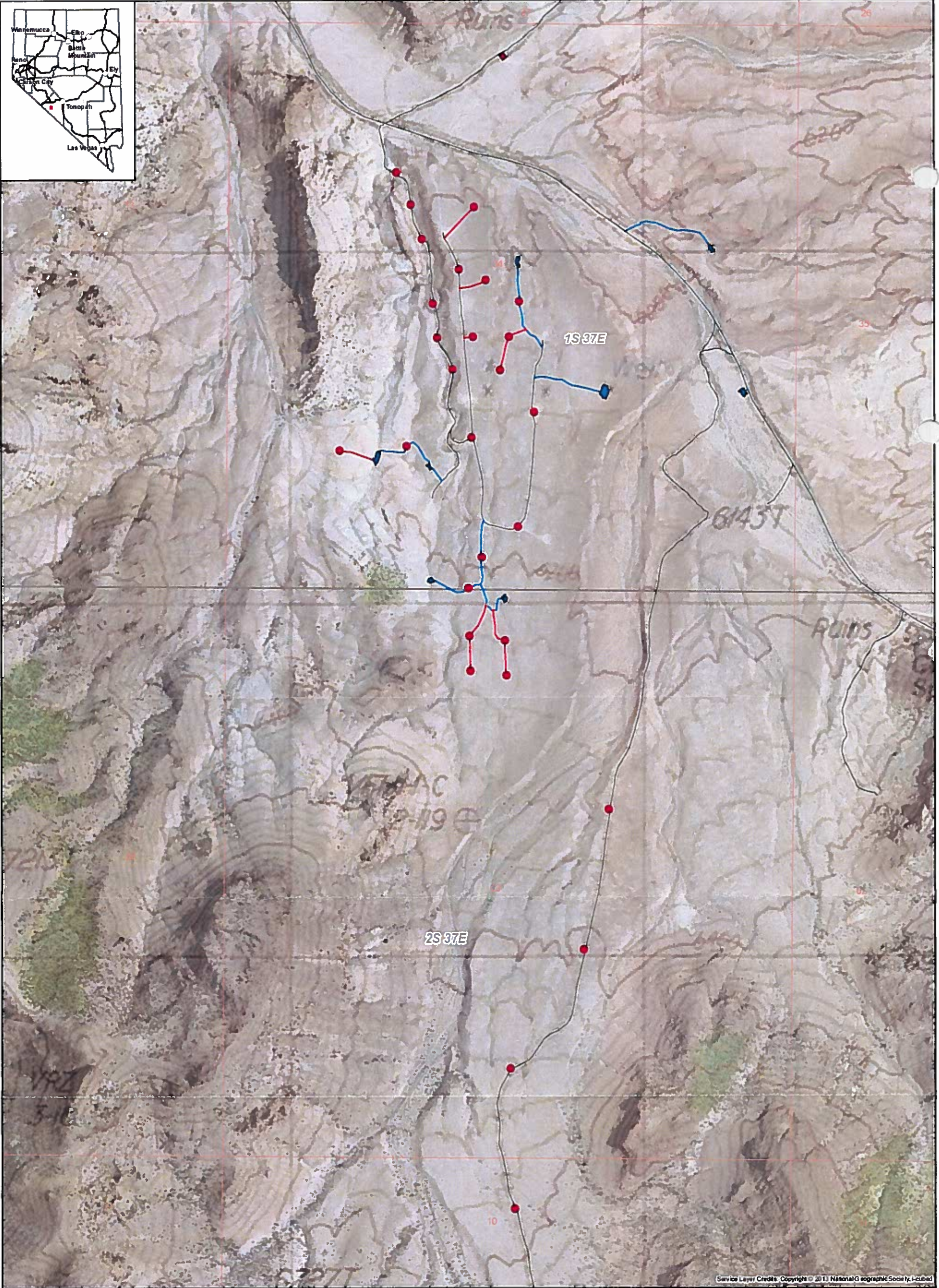
Paradigm Minerals USA Corp.

By 
Matt Weaver, Senior Vice President

October 1, 2018
Date

Appendix 1

Figure



Explanation

— Existing Road

As-Built Disturbance under Notice NVN-095045

■ Pad (8) (0.65 acre)

— Constructed Road (4,917 feet)

Planned Activity

● Drill Site (28)

— Planned Constructed Road (2,844 feet)

■ Bladder (1) (0.07 acres)

Land Status: All BLM

0 500 1,000 Feet

PARADIGM MINERALS USA CORP

**SOUTH INFILL EXPLORATION PROJECT
NOTICE**

**Project Location
As-Built and Planned Activity**

Figure 1

Date: 10/6/2018 Drawn By: JCB
Revised: Project No.: 3643
Base Map: USGS 7.5' quad: Rhyolite Ridge
File Name: 3643G_SouthInfill_Notice.mxd



Appendix 2

Reclamation Cost Estimate

**Closure Cost Estimate
Property Information**

Enter Data Below in Green and Blue Spaces

STANDARDIZED RECLAMATION COST ESTIMATOR

Version 1.4.1

Build 017b (revised to work with Excel 2016 - 24 Oct 2016)

Approved for use in Nevada, August 1, 2012

COST DATA FILE INFORMATION	
File Name:	3843I.South Infill Notice.RCE.V1.xlsm
Cost Data File:	SRCE_Cost_Data_File_1_12_Std_2018.xlsm
Cost Data Date:	August 1, 2018
Cost Data Basis:	User Data Data Cost Units: Imperial
Author/Source:	Nevada Division of Environmental Protection (NDEP) & NV BLM
PROJECT INFORMATION	
Property/Mine Name:	South Infill Notice Property Code:
Project Name:	South Infill Notice
Date of Submittal:	October 2018 Average Altitude: 6000 ft.
Select One:	<input checked="" type="radio"/> Notice or Sm Exploration Plan <input type="radio"/> Lg Exploration Plan <input type="radio"/> Mine Operation
Select One:	<input checked="" type="radio"/> Private Land <input type="radio"/> Public or Public/Private
Cost Estimate Type:	Surety
Cost Basis Category:	S. Nevada Notice Level -
Clark, Esmeralda, Lincoln and Nye Counties	
Cost Basis Description:	

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**Closure Cost Estimate
Cost Summary**

Project Name: South Infill Notice
Project Date: October 2018
Model Version: Version 1.4.1
File Name: 38431.South Infill Notice.RCE.V1.xlsm

A. Earthwork/Recontouring	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Exploration	\$1,698	\$3,329	\$739	\$5,766
Exploration Roads & Drill Pads	\$3,155	\$4,687	\$0	\$8,042
Roads	\$0	\$0	\$0	\$0
Well Abandonment	\$768	\$264	\$6	\$1,038
Pits	\$0	\$0	N/A	\$0
Quarries & Borrow Areas	\$0	\$0	\$0	\$0
Underground Openings	\$0	\$0	\$0	\$0
Process Ponds	\$0	\$0	\$0	\$0
Heaps	\$0	\$0	\$0	\$0
Waste Rock Dumps	\$0	\$0	\$0	\$0
Landfills	\$0	\$0	\$0	\$0
Tailings	\$0	\$0	\$0	\$0
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Yards, Etc.	\$0	\$0	\$0	\$0
Drainage & Sediment Control	\$0	\$0	\$0	\$0
Generic Material Hauling	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal	\$5,619	\$8,480	\$745	\$14,844
Mob/Demob if included in Other User sheet	\$0	\$0	\$0	\$0
Mob/Demob	\$3,448	\$3,448		\$6,896
Subtotal "A"	\$9,065	\$11,926	\$745	\$21,735
B. Revegetation/Stabilization	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Exploration	\$0	\$0	\$0	\$0
Exploration Roads & Drill Pads	\$605	\$230	\$1,863	\$2,698
Roads	\$0	\$0	\$0	\$0
Well Abandonment				N/A
Pits	\$0	\$0	\$0	\$0
Quarries & Borrow Areas	\$0	\$0	\$0	\$0
Underground Openings				N/A
Process Ponds	\$0	\$0	\$0	\$0
Heaps	\$0	\$0	\$0	\$0
Waste Rock Dumps	\$0	\$0	\$0	\$0
Landfills	\$0	\$0	\$0	\$0
Tailings	\$0	\$0	\$0	\$0
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Yards, Etc.	\$0	\$0	\$0	\$0
Drainage & Sediment Control	\$0	\$0	\$0	\$0
Generic Material Hauling	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "B"	\$605	\$230	\$1,863	\$2,698
C. Detoxification/Water Treatment/Disposal of Wastes**	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Process Ponds/Sediment				\$0
Heaps				\$0
Dumps (Waste & Landfills)				\$0
Tailings				\$0
Surplus Water Disposal				\$0
Monitoring				\$0
Miscellaneous				\$0
Solid Waste - On Site	\$0	\$0	N/A	\$0
Solid Waste - Off Site				\$0
Hazardous Materials				\$0
Hydrocarbon Contaminated Soils	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "C"	\$0	\$0	\$0	\$0
D. Structure, Equipment and Facility Removal, and Misc.	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Other Demolition	\$0	\$0	\$0	\$0
Equipment Removal	\$0	\$0	\$0	\$0
Fence Removal	\$0	\$0	\$0	\$0
Fence Installation	\$0	\$0	\$0	\$0
Culvert Removal	\$0	\$0	N/A	\$0
Pipe Removal	\$0	\$0	N/A	\$0
Powerline Removal	\$0			\$0
Transformer Removal	\$0			\$0
Rip-rap, rock lining, gabions	\$0	\$0	\$0	\$0
Other Misc. Costs	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "D"	\$0	\$0	\$0	\$0
E. Monitoring	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Reclamation Monitoring and Maintenance	\$4,151	\$504	\$188	\$4,841
Ground and Surface Water Monitoring	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Subtotal "E"	\$4,151	\$504	\$188	\$4,841
F. Construction Management & Support	Labor	Equipment ⁽²⁾	Materials	Total
Construction Management	\$0	\$0	N/A	\$0
Construction Support	\$0	\$0	\$0	\$0
Road Maintenance	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "F"	\$0	\$0	\$0	\$0
Subtotal Operational & Maintenance Costs	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials ⁽³⁾	Total
Subtotal A through F	\$13,621	\$12,660	\$2,794	\$29,275

** Other Operator supplied costs - additional documentation required.

**Closure Cost Estimate
Cost Summary**

**Project Name: South Infill Notice
Project Date: October 2018
Model Version: Version 1.4.1
File Name: 3843I.South Infill Notice.RCE.V1.xlsm**

Indirect Costs		Include?	Total	
1. Engineering, Design and Construction (ED&C) Plan (7)			N/A	
2. Contingency (8)			N/A	
3. Insurance (9)	\$207		\$207	
4. Performance Bond (10)			N/A	
5. Contractor Profit (11)			\$2,928	
6. Contract Administration (12)			\$2,928	
7. Government Indirect Cost (13)			\$615	
Subtotal Add-On Costs			\$6,678	
Total Indirect Costs as % of Direct Cost			23%	
GRAND TOTAL			\$35,953	
Administrative Cost Rates (%)				
	Cost Ranges for Indirect Cost Percentages			
	<=	<=	<=	>
1. Engineering, Design and Construction (ED&C) Plan (7)	\$1,000,000	\$25,000,000	\$25,000,000	Small Plan
Variable Rate	8%	6%	4%	0%
2. Contingency (8)	\$500,000	\$5,000,000	\$50,000,000	Small Plan
Variable Rate	10%	8%	6%	0%
3. Insurance (9)	1.5% of labor costs			
4. Bond (10)	3.0% of the O&M costs if O&M costs are >\$100,000			
5. Contractor Profit (11)	10% of the O&M costs			
6. Contract Administration (12)	<=	<=	<=	>
Variable Rate	\$1,000,000	\$25,000,000	\$25,000,000	
Government Indirect Cost (13)	21% of contract administration			

RECLAMATION COST ESTIMATION SUMMARY SHEET FOOTNOTES

1. Federal construction contracts require Davis-Bacon wage rates for contracts over \$2,000. Wage rate estimates may include base pay, payroll loading.
2. The reclamation cost estimate must include the estimated plugging cost of at least one drill hole for each active drill rig in the project area. Where the
3. Miscellaneous items should be itemized on accompanying worksheets.
4. Fluid management should be calculated only when mineral processing activities are involved. Fluid management represents the costs of maintaining
5. Handling of hazardous materials includes the cost of decontaminating, neutralizing, disposing, treating and/or isolating all hazardous materials used.
6. Any mitigation measures required in the Plan of Operations must be included in the reclamation cost estimate. Mitigation may include measures to avoid,
7. Engineering, design and construction (ED&C) plans are often necessary to provide details on the reclamation needed to contract for the required work. To
8. A contingency cost is included in the reclamation cost estimation to cover unforeseen cost elements. Calculate the contingency cost as a percentage of the
9. Insurance premiums are calculated at 1.5% of the total labor costs. Enter the premium amount if liability insurance is not included in the itemized unit
10. Federal construction contracts exceeding \$100,000 require both a performance and a payment bond (Miller Act, 40 USC 270a et seq.). Each bond premium
11. For Federal construction contracts, use 10% of estimated O&M cost for the contractor's profit.
12. To estimate the contract administration cost, use 6 to 10% of the operational and maintenance (O&M) cost. Calculate the contract administration cost as a
13. Government indirect cost rate is 21% of the contract administration costs.

**Closure Cost Estimate
Exploration**

Project Name: South Infill Notice- Notice or Exploration
 Date of Submittal: October 2018
 File Name: 38431.South Infill Notice.RCEV1.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Skt_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration - Cost Summary				
	Labor	Equipment	Materials	Totals
Hole Abandonment Costs	\$1,690	\$3,320	\$720	\$5,730
Trench Backfill Costs	\$0	\$0	\$0	\$0
Subtotal Exploration	\$1,690	\$3,320	\$720	\$5,730
Trench Revegetation Costs	\$0	\$0	\$0	\$0
TOTALS	\$1,690	\$3,320	\$720	\$5,730

Exploration Drillhole Abandonment - User Input									
Facility Description									
	Description (required)	ID Code	Hole Type (select)	Diameter in	Total Number of Holes	Time Holes Open at One Time	Casing to Remove ft	Average Depth of Hole (ft)	Hole Plug Method (select)
1	Open Drill Hole		Reverts Ore	6.0	54.0	2.0	0.0	1,000.0	Grout + Backfill

Notes:
 1. If Core holes are pre-drilled, use length of hole below pre-drilled length
 2. If Top Plug is selected, assumes maximum 12hr labor time to place plug and backfill with cuttings (including move-to-set up time).
 Up to two holes will be open at any given time.
 Assuming an average of two holes drilled per pad (7-20-05)

Exploration Trenches - User Input									
Facility Description									
	Description (required)	ID Code	Trench Length ft	Trench Depth ft	Trench Bottom Width ft	Trench Slopes Angle degrees	Additional ft for Wall-sh (ft)	Backfill Material (select)	Backfill Type (select)
1									

Notes:
 1. Include operator hours necessary to walk equipment in from drop-off point to work area
 2. Material Types are used for density correction based on material densities in Caterpillar Performance Handbook material density table

Exploration Drillhole Abandonment									
	Description (required)	Volume of depth ft ³	Hole Plugging Material (1)	Total Grout Volume in cy	Total Casing Volume in cy	Total Top Seal Volume in cy	Drillhole Abandonment Hours in hrs	Casing Removal Labor Cost in \$	Casing Removal Equipment Cost in \$
1	Open Drill Hole	0.200	Grout + Casing	0.60	0.22	0.19	7	\$0	\$0
				0.60	0.22	0.19	7	\$0	\$0
								\$3,320	\$3,320
								\$1,000	\$1,000
								\$14	\$14
								\$720	\$720
								\$5,730	\$5,730

Notes:
 1. Assumes grout backfill from bottom of hole to 50' (15.24m) above static water level, up to 10' (3m) from top of hole
 2. Assumes 25% loss to formation for grout backfill
 3. If Top Plug hole plug method is used, assumes physical plug installed without backfill, grout or cement. Not available option for Nevada projects
 4. Assumes top 20' (6 m) of hole is plugged with cement if "Grout Only", "Backfill + Grout", or "Cement Plug" hole plug method are chosen.
 5. Assumes that if casing is not cemented entire length, it does not include temporary surface casing
 6. Assumes that if casing is not cemented entire length, it does not include temporary surface casing
 7. Assumes fixed hours per hole for setup & tear-down and moving between holes (see Productivity Sheet) per drill hole (includes rig time if grouting required, labor crew only if casing backfill only)

**Closure Cost Estimate
Expl. Roads & Pads**

Project Name: South Infill Notice- Notice of Exploration
 Date of Submission: October 2018
 File Name: 38431.South Infill Notice.RCE.V1.xlam
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE Cost Data File 1 12 Std 2018.xlam
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary			
	Labor	Equipment	Materials
Grading Costs	\$3,155	\$4,897	N/A
Cover Placement Cost	\$0	\$0	N/A
Regravel/Scarify Cost	\$0	\$0	\$0
Subtotal Earthworks	\$3,155	\$4,897	\$0
Revegetation Cost	\$720	\$1,863	\$2,688
TOTALS	\$3,790	\$6,760	\$2,688

You must fill in ALL green cells and relevant blue cells in this section for each road													
Physical (1) - MANDATORY													
Exploration Roads & Pads - User Input													
	Description (required)	ID Code	Underlying Ground % grade	Ungraded Slope H:V	Cut Slope degrees	Road + Drill Pad Length ft	Road Width ft	Number of Drill Pads	Individual Pump Volume cu yd	Drop Pad Width ft	Drop Pad Length ft	Drop Replacement Percent %	Drop Replacement Area (if calculated elsewhere) sq ft
1	As-Built Surface Disturbance from MNH-092645		18.0	1:3	24.0	8,495	12.0	1	0	54.0	81	100%	2,81
2	Planned Winter Backfill Laydown Area		18.0	1:3	24.0	81	0.8	1	0	54.0	81	100%	
3	Planned Constructed Roads and Drill Sites		18.0	1:3	24.0	4,344	12.0	28	52	54.0	50	100%	

Notes:
 1. All Physical parameters must be input even if material overrides for volume or area are used.
 2. Slope replacement refers to the percentage of cut volume replaced during regrading.
 3. If Slope from facility to borrow source is >20, downhill travel time may be underestimated due to limitation of uphill travel time curves and downhill speed tables from CAT Handbook (see Productivity Sheet)
 4. Sump volume will be applied to all roads on slopes >20%. On slopes >20% pad width (i.e. cut volume) should be adequate to account for sump volume.

You must fill in ALL green cells and relevant blue cells in this section for each road													
Exploration Roads & Pads - User Input (cont.)													
Grading													
	Description (required)	Regrade Material Condition (select)	Cut Material Type (select)	Reconstructing Equipment Fleet (select)	Additional Hrs for Work-in (H)	Growth Media Material Type (select)	Growth Media Equipment Fleet (select)	Maximum Fixed Size (inches) (select)	Additional Hrs for Work-in (H)	Seed Mix (select)	Mulch (select)	Fertilizer (select)	Scarifying/Fluffing? (select)
1	As-Built Surface Disturbance from MNH-092645	1	1.8 - broken	Small Dozer	1.0					Max 3	None	None	No
2	Planned Winter Backfill Laydown Area	1	1.8 - broken	Small Dozer						Max 3	None	None	No
3	Planned Constructed Roads and Drill Sites	1	1.8 - broken	Small Dozer						Max 3	None	None	No

Notes:
 1. Include operator hours necessary to walk equipment in from drop-off point to work area
 2. Material Types are used for density correction based on material densities in Caterpillar Performance Handbook material density table

**Closure Cost Estimate
Expl. Roads & Pads**

Project Name: South Infill Notice- Notice of Exploration
Date of Submittal: October 2018
File Name: 38431.South Infill Notice.RCE.V1.xlsm
Model Version: Version 1.4.1
Cost Data: User Data
Cost Data File: SRCE Cost Data File_1_12_2018.xlsm
Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary				
	Labor	Equipment	Materials	Totals
Grading Costs	\$3,163	\$4,887	N/A	\$8,050
Cover Placement Cost	\$0	\$0	N/A	\$0
Regrading/Scarifying Cost	\$3,163	\$4,887	N/A	\$8,050
Revegetation Cost	\$695	\$730	\$1,853	\$3,278
TOTAL \$	\$6,911	\$10,447	\$1,853	\$19,211

Exploration Roads & Pads - Calculations

Regrading Volume and Footprint Volume

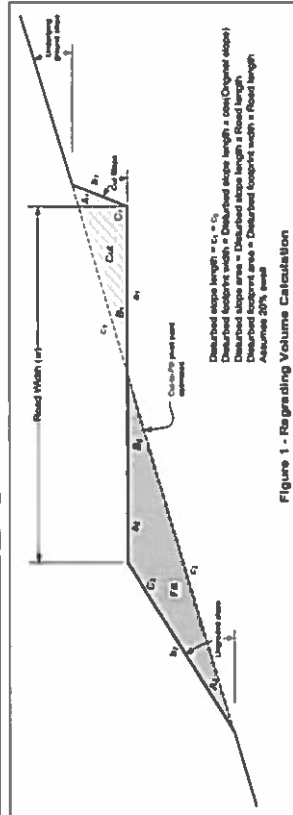


Figure 1 - Regrading Volume Calculation

Will not allow dozer for slopes greater than 30%
For dozer regading push distance = road width
Assumes dozer push is uphill
Assumes minimum push distance of 100 ft

Swell Factor: 1.2

Ripping/Scarifying Calculations

Minimum 1 hr ripping/scarifying time per area
Number of passes = Final slope length x Grader width
Travel distance = Number of passes x Road length
Total hours = (Travel distance x Grader productivity) x (Number of passes x Grader maneuver time)
For dozer regading assumes push distance = 3 x road width

Revegetation Calculations

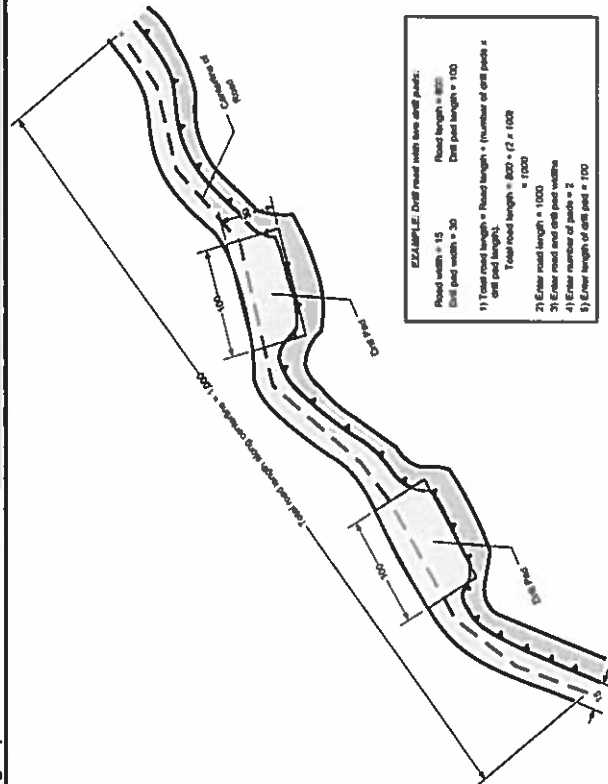
Minimum of 1 acre crew time per area

Closure Cost Estimate Expl. Roads & Pads

Project Name: South Infill Notice- Notice of Exploration
 Date of Submittal: October 2018
 File Name: 38431.South Infill Notice.RCE.V1.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_Fila_1_12_Sld_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary				
	Labor	Equipment	Materials	Totals
Grinding Costs	\$3,165	\$4,897	N/A	\$8,062
Cover Placement Cost	\$0	\$0	N/A	\$0
Regrading/Scarifying Cost	\$3,165	\$4,897	N/A	\$8,062
Revegetation Cost	\$0	\$0	\$0	\$0
TOTALS	\$3,165	\$4,897	\$0	\$8,062

Inputting Exploration Roads and Drill Pads



**Closure Cost Estimate
Expi. Roads & Pads**

Project Name: South Infill Notice- Notice or Exploration
Date of Submittal: October 2018
File Name: 38431.South Infill Notice.RCE.V1.xlsm
Model Version: Version 1.4.1
Cost Data: User Data
Cost Data File: SRCE_Cost_Data_File_1_12_Sld_2018.xlsm
Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary				
	Labor	Equipment	Materials	Totals
Grading Costs	\$3,166	\$4,887	N/A	\$8,053
Cover Placement Cost	\$0	\$0	N/A	\$0
Regrading/Scarifying Cost	\$0	\$0	N/A	\$0
Subtotal Earthworks	\$3,166	\$4,887	N/A	\$8,053
Revegetation Cost	\$605	\$270	\$1,953	\$2,828
TOTALS	\$3,771	\$5,157	\$1,953	\$10,881

Exploration Roads & Pads - Regrading Costs									
	Description (Inquired)	Total Road Length ft	Total Drill Pad Length ft	Regrading Volume cy	Reconstructing Foot ft	Equipment Productivity Cyd/Hr	Equipment Hours (Hr)	Total Equipment Cost \$	Total Regrading Cost \$
1	As-Built Surface Disturbance from NVN-055045	4,917	488	2,241	0GR	85	14	\$1,077	\$1,077
2	Planned Water Barrier Laydown Area	0	81	41	0GR	171	1	\$73	\$114
3	Planned Constructed Roads and Drill Sites	2,844	1,400	5,185	0GR	85	28	\$2,058	\$3,162
	TOTALS	7,761	1,889	7,467			43	\$3,133	\$4,353

(1) Includes walk-in time based on distance and travel speed (see Productivity sheet for speeds)

Exploration Roads & Pads - Growth Media Costs						
	Description (Inquired)	Growth Media Volume cy	Growth Media Replacement Foot ft	Number of Trucks/ Scrapers	Total Labor Cost \$	Total Growth Media Cost \$
1	As-Built Surface Disturbance from NVN-055045				\$0	\$0
2	Planned Water Barrier Laydown Area				\$0	\$0
3	Planned Constructed Roads and Drill Sites				\$0	\$0

Exploration Roads & Pads - Scarifying/Revegetation Costs									
	Description (Inquired)	Surface Area acres	Scarifying Foot ft	Scarifying Labor Costs \$	Scarifying Hours Hrs	Scarifying Equipment Cost \$	Total Scarifying Cost \$	Revegetation Material Cost \$	Total Revegetation Cost \$
1	As-Built Surface Disturbance from NVN-055045	2.01				\$201	\$201	\$76	\$1,007
2	Planned Water Barrier Laydown Area	0.08				\$100	\$100	\$29	\$167
3	Planned Constructed Roads and Drill Sites	3.04				\$304	\$304	\$118	\$1,524
	TOTALS	5.13				\$605	\$605	\$223	\$2,898

Closure Cost Estimate
Well Abandonment

Project Name: South Infill Notice- Notice or Exploration
Date of Submittal: October 2018
File Name: 3843\South Infill Notice,RCE.V1.xlsm
Model Version: Version 1.4.1
Cost Data: User Data
Cost Data File: SRCE Cost Data File_1_12_Sid 2018.xlsm
Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Well Abandonment				
	Labor	Equipment	Materials	Totals
Production, Dewatering, Infiltration Wells	\$0	\$0	\$0	\$0
Monitoring Wells	\$768	\$264	\$5	\$1,036
TOTALS	\$768	\$264	\$5	\$1,036

Production, Dewatering and Infiltration Well Closure

Description (required)	ID Code	Number of Holes	Casing Diam in	Average Depth ⁽¹⁾ ft bgs	Depth to First Water ft bgs	Original Static Water Level ft bgs	Top of Shotted Casing ⁽²⁾ ft bgs	Blank Casing Below Top of Screen ⁽⁷⁾ ft	Type of Pump (if any) (select)	Depth to Pump ft bgs	Hole Plug Method (select)	Casing Volume per ft of	Perforation Length ⁽⁴⁾ ft	Grout Volume per Hole ^(4a) cy	Cement Volume per Hole ⁽⁶⁾ cy	Inert Media Volume per ⁽⁷⁾ Hole ⁽⁷⁾ cy	Pump Removal Labor Cost \$	Pump Removal Equip Cost \$	Perf Labor Cost \$	Perf Equip Cost ⁽⁹⁾ \$	Grout + Cement Labor Cost ⁽⁸⁾ \$	Grout + Cement Equip Cost ⁽⁸⁾ \$	Grout + Cement Material Cost \$	Inert Media Labor Cost ⁽¹⁰⁾ \$	Inert Media Equip Cost ⁽¹⁰⁾ \$	Total Cost \$

- (1) For previously abandoned holes enter "0" for depth.
(2) Wells abandoned per Nevada Administrative Code (NAC 534.420). Hole grouted and perforated from bottom to 50 feet (15.24m) above the top of the screen, or first water encountered or original static water level, depending on vertical hydraulic gradient and well construction parameters. Inert media (cuttings or aluminum) used from top of grout to top seal.
(3) Perforation length = amount of blank casing below first water (for confined aquifers) or predicted recovered water table (unconfined aquifers) + 50 feet (15.24m) of blank casing above water table.
(4) Assumes 50' (15.24m) sanitary seal at top of hole. Therefore, perforation and grouting only required to bottom of sanitary seal.
(5) Assumes 100% loss to formation for grout (abandonhole) for screened and perforated sections.
(6) Assumes 20' (6m) top seal of cement in casing only. See note 4.
(7) Inert material is cuttings or aluminum sourced locally.
(8) Includes perforation tool wear cost/ft of perforation (see Productivity Sheet).
(9) See Productivity Sheet for hourly production. Minimum 1 hr per hole + fixed hours per hole for move and setup. If no perforation required, use standard drill rig.
(10) See Productivity Sheet for hourly production. Minimum 1 hr per hole.

Notes:

Monitoring Well Closure

Description (required)	ID Code	Number of Holes	Casing Diam in	Average Depth ⁽¹⁾ ft bgs	Top of Screen ⁽¹⁾ ft bgs	Hole Plug Method (select)	Casing Volume per ft of	Grout Volume ⁽²⁾ ft ³ cy	Cement Volume per Hole ⁽⁶⁾ cy	Backfill Volume per Hole ⁽⁵⁾ cy	Total Grouting Hours/ Hole hr	Total Inert Media Hour/ Hole hr	Grout + Cement Labor Cost ⁽⁸⁾ \$	Grout + Cement Equip Cost ⁽⁸⁾ \$	Grout + Cement Material Cost \$	Inert Media Labor Cost ⁽¹⁰⁾ \$	Inert Media Equip Cost ⁽¹⁰⁾ \$	Total Cost \$

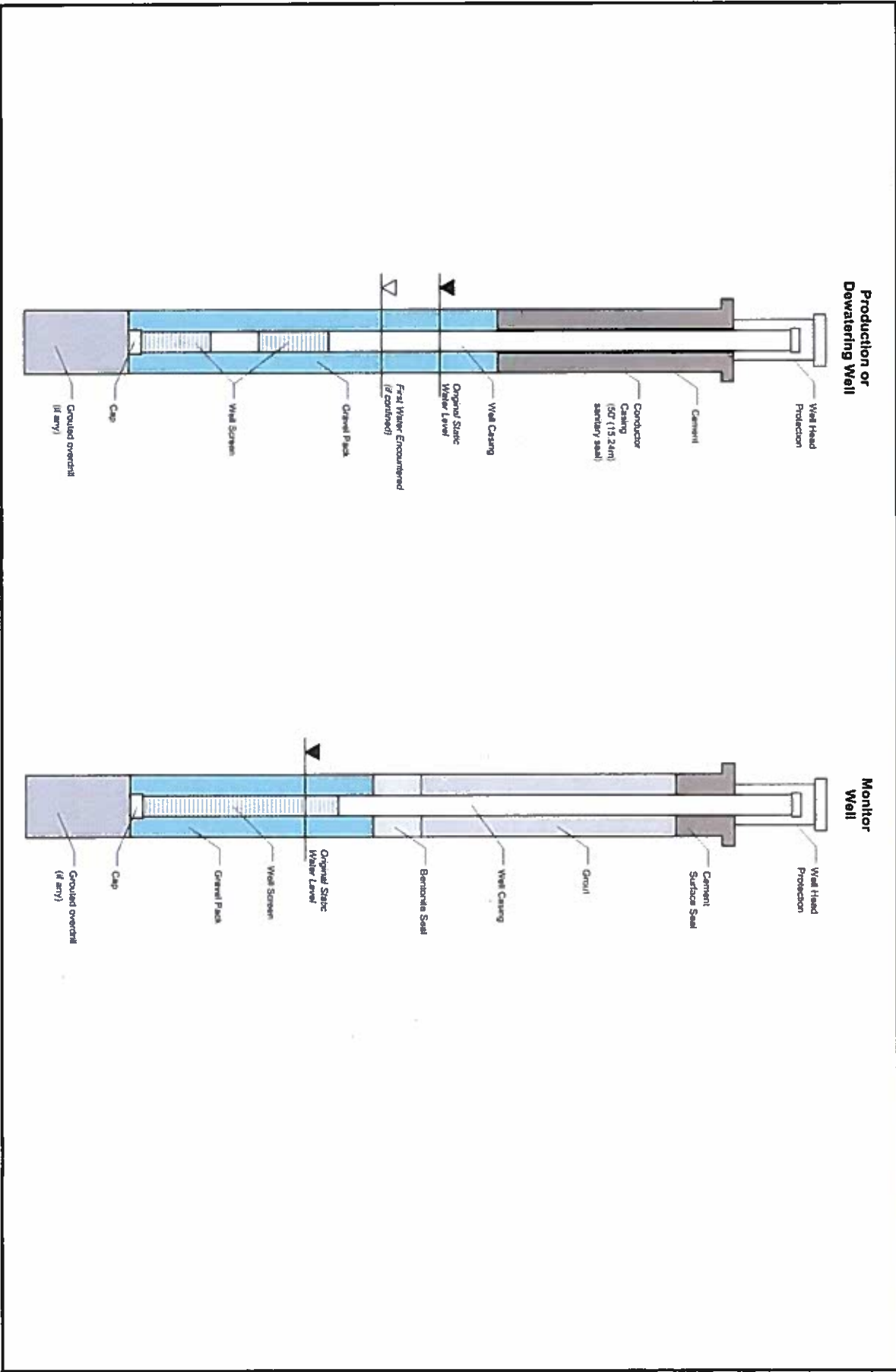
- Wells abandoned per NAC 534.420 with bentonite grout placed to 50 feet above the top of the screen (see note 1).
(1) Assumes top of screen is at or above the static water level (in unconfined aquifers) or the depth of first water encountered (in confined aquifers).
(2) Assumes 25% loss to formation for grouting.
(3) Grouting only required to 50' (15.24m) above the top of screen because monitor wells are constructed with a seal in the annular space.
(4) Assumes top 20' (6m) plugged with cement.
(5) Assumes hole plugged with inert material (cuttings or aluminum) above grout up to cement surface plug.
(6) Assumes hole plugged with inert material (cuttings or aluminum) above grout up to cement surface plug.
(7) See Productivity Sheet for hourly production. Minimum 1 hr per hole + fixed hours per hole for move and setup (see Productivity Sheet).
(8) See Productivity Sheet for hourly production. Minimum 1 hr per hole.

Notes:

Project Name: South Infill Notice- Notice of Exploration
Date of Submittal: October 2018
File Name: 38431.South Infill Notice RCE.V1.xlsm
Model Version: Version 1.4.1
Cost Data: User Data
Cost Data File: SRCE_Cost_Data_File_1_12_Sld_2018.xlsm
Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Well Abandonment				
	Labor	Equipment	Materials	Totals
Production, Dewatering, Infiltration Wells	\$0	\$0	\$0	\$0
Monitoring Wells	\$766	\$264	\$61	\$1,036
TOTALS	\$766	\$264	\$61	\$1,036

Well Construction



Closure Cost Estimate Monitoring

Project Name: South Infill Notice- Notice or Exploration
 Date of Submittal: October 2018
 File Name: 38431.South Infill Notice.RCE.V1.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Reclamation Monitoring & Maintenance - Cost Summary				
	Labor	Equipment	Lab & Materials	Totals
Revegetation Maintenance	\$51	\$19	\$186	\$256
Erosion Maintenance	\$0	\$0	N/A	\$0
Reclamation Monitoring	\$4,100	\$485	N/A	\$4,585
Subtotal Reclamation Monitoring	\$4,151	\$504	\$186	\$4,841
Water Quality Monitoring	\$0	\$0	\$0	\$0
TOTAL MONITORING	\$4,151	\$504	\$186	\$4,841

Reclamation Maintenance								
Description	Total Revegetation Surface Area (1,2) acres	% Area Requiring Re seeding	Seed Mix (select)	Area Requiring Re seeding acres	Seed \$/acres	Labor \$/acres	Equipment \$/acres	Totals \$
Revegetation Maintenance	5	10%	Mix 3	0.5	\$363.00	\$100.00	\$38.00	
Labor								\$51
Equipment								\$19
Materials								\$186
Cost/Acre								\$501
							Subtotal	\$256

Notes: 1) Surface area is NOT the same as footprint disturbance area typically used for permitting purposes.

	Total Volume Growth Media cy	% Volume Requiring Maintenance	Average Growth Media Placement Cost \$/CY	Volume Requiring Replacement cy		Labor (assume: 25%) \$/acres	Equipment (assume: 75%) \$/acres	Total \$
Erosion Maintenance	0		\$0.00	0		\$0.00	\$0.00	\$0

Notes:

Reclamation Monitoring					
Description	Hrs/Day	Days/Year	Number of Years	Rate \$/hr	
Field Work					
Field Geologist/Engineer				\$149.49	\$0
Range Scientist	6	1	3	\$136.68	\$2,460
Reporting					
Field Geologist/Engineer				\$149.49	\$0
Range Scientist	4	1	3	\$136.68	\$1,640
					Subtotal \$4,100
Travel					
	Hrs/Trip hr	Trips/Year	Years	Truck Cost \$/hr	
Travel	6	1	3	\$26.97	\$485
					Subtotal \$485
Total Reclamation Monitoring					\$4,585

Notes:

**Closure Cost Estimate
Labor Rates**

Project Name: South Infill Notice- Notice or Exploration
 Date of Submittal: October 2018
 File Name: 38431.South Infill Notice.RCE.V1.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Color Code Key	
User Input - Direct Input	Direct Input
User Input - Pull Down List	Pull Down Selection
Program Constant (can override)	Alternate Input
Program Calculated Value	Locked Cell - Formula or Reference

ZONE ADJUSTMENTS		
Cost Basis/Project Region	S. Nevada Notice Level	Clark, Esmeralda, Lincoln and Nye Counties
Power Equipment Operators	>60 miles	\$3.50
Truck Drivers	>70 miles	\$3.50
Laborers	>50 miles	\$3.25
INDIRECT COSTS		
Unemployment (%)	3.00%	
Retirement/SS/Medicare (%)	7.65%	
Workman's Compensation (%)	0.075	
Other Indirects		
State Payroll Tax (13)(15)(17)		
Total Other Indirects	0.00%	

HOURLY LABOR RATE TABLE										
EQUIPMENT TYPE (1) OR JOB DESCRIPTION	Labor Group	Base Rate (\$/hr)	Zone Adjustment (\$/hr)	Hourly Wage (\$/hr)	Fringe (\$/hr)	Retirement/ Medicare (\$/hr)	Unemployment Insurance (\$/hr)	Workman's Compensation (\$/hr)	Other Indirect Costs (\$/hr)	Total (\$/hr)
Equipment Operators (\$/hr) (2)										
Bulldozers										
D6R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D6R w/ Winch					\$0.00					
D7R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D8R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D9R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D10R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
D11R	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
Wheeled Dozers										
R24G					\$0.00					
R34G					\$0.00					
R44					\$0.00					
R54G					\$0.00					
Motor Graders										
120H	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.69	\$0.00	\$73.67
14G/H	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.69	\$0.00	\$73.67
16G/H	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.69	\$0.00	\$73.67
24H					\$0.00					
Track Excavators										
312C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
320C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
325C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
330C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
345L	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
365BL					\$0.00					
385BL	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.87
Scrapers										
831G	Group 15	\$59.23	\$3.50	\$62.73	\$0.00	\$1.88	\$4.80	\$4.70	\$0.00	\$74.12
831Q	Group 15	\$59.23	\$3.50	\$62.73	\$0.00	\$1.88	\$4.80	\$4.70	\$0.00	\$74.12
Wheeled Loaders										
R24G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
R28G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
R50G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
R66G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
R72G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
R80G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
R88G	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.69	\$0.00	\$73.67
R90					\$0.00					
R92G	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.69	\$0.00	\$73.67
R94D					\$0.00					
L2350					\$0.00					
Shovels										
PC2000					\$0.00					
PC3000					\$0.00					
PC4000					\$0.00					
PC5500					\$0.00					
PC8000					\$0.00					
Hydraulic Hammers										
H-120 (lbs 325)										
H-160 (lbs 345)										
H-160 (lbs 365/385)										
Demolition Shears										
S340 (lbs 322/325/330)										
S365 (lbs 330/345)										
S380 (lbs 365/385)										
Demolition Grapples										
G315 (lbs 322/325)										
G330 (lbs 325/330)										
G330 (lbs 345/365)										

**Closure Cost Estimate
Labor Rates**

Project Name: South Infill Notice- Notice or Exploration
 Date of Submittal: October 2018
 File Name: 38431.South Infill Notice.RCE.V1.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Color Code Key	
User Input - Direct Input	Direct Input
User Input - Pull Down List	Pull Down Selection
Program Constant (can override)	Alternate Input
Program Calculated Value	Locked Cell - Formula or Reference

ZONE ADJUSTMENTS

Cost Basis/Project Region	S. Nevada Notice Level	Clark, Esmeralda, Lincoln and Nye Counties
Power Equipment Operators	>66 miles	\$3.50
Truck Drivers	>78 miles	\$3.50
Laborers	>50 miles	\$3.25

INDIRECT COSTS

Unemployment (%)	3.00%
Retirement/SS/Medicare (%)	7.65%
Workman's Compensation (%)	0.075

Other Indirects

State Payroll Tax (13) (15) (17)

Total Other Indirects 0.00%

HOURLY LABOR RATE TABLE

Other Equipment										
420D 4WD Backhoe	Group 4	\$59.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00	\$73.13
428D 4WD Backhoe	Group 4	\$59.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00	\$73.13
CS533E Vibratory Roller	Group 4	\$59.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00	\$73.13
CS633E Vibratory Roller					\$0.00					
CP633E Sheepsfoot Compactor					\$0.00					
CP633E Sheepsfoot Compactor					\$0.00					
Light Truck - 1.5 Ton					\$0.00					
Supervisor's Truck					\$0.00					
Flatbed Truck					\$0.00					
Air Compressor - tools	Group 1	\$55.67	\$3.50	\$59.17	\$0.00	\$1.78	\$4.53	\$4.44	\$0.00	\$69.91
Welding Equipment	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
Heavy Duty Drill Rig	Group 2	\$58.62	\$3.50	\$62.12	\$0.00	\$1.80	\$4.60	\$4.51	\$0.00	\$71.03
Pump (plugless) Drill Rig	Group 2	\$58.62	\$3.50	\$62.12	\$0.00	\$1.80	\$4.60	\$4.51	\$0.00	\$71.03
Concrete Pump					\$0.00					
Gas Engine Vibrator	Group 6	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.66	\$0.00	\$73.39
Generator 5KW					\$0.00					
HDEP Welder (pipe or liner)					\$0.00					
5 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
20 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
50 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.52
120 Ton Crane					\$0.00					

NOTES:

(1) Equipment Type: Caterpillar model or equivalent, LeTourneau
 (2) Equipment Operator Source: D-B MY180234 01/08/2016
 (3) Zone Basis: From Las Vegas City Hall

Truck Drivers (\$/hr) (4)

725	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$56.22
730	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$56.22
735	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$56.22
740	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$56.22
769D	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$56.22
773E					\$0.00					
777D	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$56.22
785C					\$0.00					
793C					\$0.00					
797B					\$0.00					
613E (5,000 gal) Water Wagon	Group 3	\$48.44	\$3.60	\$49.94	\$0.00	\$1.50	\$3.82	\$3.75	\$0.00	\$56.00
621E (8,000 gal) Water Wagon	Group 4	\$48.62	\$3.50	\$50.12	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$56.22
777D Water Truck					\$0.00					
785C Water Truck					\$0.00					
Dump Truck (10-12 yd3)	Group 2	\$48.23	\$3.60	\$49.73	\$0.00	\$1.49	\$3.80	\$3.73	\$0.00	\$55.76

NOTES:

(4) Truck Driver Source: D-B MY180234 01/08/2016
 (3) Zone Basis: From Las Vegas City Hall

Color Code Key	
User Input - Direct Input	Direct Input
User Input - Pull Down List	Pull Down Selection
Program Constant (can override)	Alternate Input
Program Calculated Value	Locked Cell - Formula or Reference

Cost Basis/Project Region	S. Nevada Notice Level	Clark, Esmeralda, Lincoln and Nye Counties
Power Equipment Operators	>40 miles	\$3.50
Truck Drivers	>70 miles	\$3.50
Laborers	>50 miles	\$3.25

Unemployment (%)	3.00%
Retirement/SS/Medicare (%)	7.85%
Workmen's Compensation (%)	0.075

State Payroll Tax (13), (15), (17)

Laborers (\$/hr) (5,7)

NOTES:

(8) Laborer Source	0-8 SUPV201 - 001 10/1/2010
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(7) Carpenter Source	D-8 SUPV2011-001 10/1/2010
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(8) Zone Book: From Las Vegas City Hall

[illegible]

NOTES:

Range: R.S.Meigs 2018 Q2 09 21 1.520 0200 Total Incl O&P-10% Adjusted for Elec, HV

(3) Foreman Source	R.L. Moore 2018 C2 (PI 31 1320 0200 Total Incl. 0.4% - 10%) Acquired for ERM, NY
--------------------	--

Technical Labor Source	BGR Consulting 2018 (Total incl. O&A-10%) Adjusted for Zero-Tier and Inc.
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Other Labor Source:

Additional User Markups

added by the user to the

Account for site-specific:

DATE OF THE REPORT: 2/2/2011

2018 MOB/DEMOB using R.S. MEANS and SRCE equipment and DAVIS-BACON wages										
blue font is for project specific user input		Miles from Washoe County Courthouse to project, one way 293								
		Miles from equipment rental yard to project, one way (9) 276								
PMU - South Infill Notice - October 2018, Mob from Las Vegas, NV		Hours travel time @ 55 MPH 5.02								
Equipment	Mobilization \$/hour (1)	\$ Flat Rate load & unload (2)	\$/hour Deadhead (empty return cost) (3)	Disassembly and assembly (4)	Permit cost \$ (5)	Pilot car costs	# of units	One Way Mob Cost	Total Mob and Demob Cost	
Bulldozers										
D6R	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -	1	\$ 1,088	\$ 2,175	
D7R	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 455		\$ -	\$ -	
D8R	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 633		\$ -	\$ -	
D9R	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 633		\$ -	\$ -	
D10R	\$ 150	\$ 150	\$ 150	\$ 65,940	\$ 25	\$ 950		\$ -	\$ -	
D11R (two transports) (7)	\$ 150	\$ 150	\$ 150	\$ 139,848	\$ 25	\$ 633		\$ -	\$ -	
Motor Graders										
14G/H	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
16G/H	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 317		\$ -	\$ -	
Track Excavators										
320C	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -	
325C	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -	
345B	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 633		\$ -	\$ -	
385BL	\$ 150	\$ 150	\$ 150	\$ 46,260	\$ 25	\$ 633		\$ -	\$ -	
Scrapers										
631G	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 633		\$ -	\$ -	
637G PP	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 633		\$ -	\$ -	
Wheeled Loaders										
928G	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
966G	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
972G	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -	
988G	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 317		\$ -	\$ -	
992G (two transports) (7)	\$ 150	\$ 150	\$ 150	\$ 76,440	\$ 25	\$ 633		\$ -	\$ -	
Hydraulic Hammers										
H-120 (fits 325) no charge, mobilize with mac	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
H-160 (fits 345) no charge, mobilize with mac	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
H-180 (fits 365/385) no charge, mobilize with	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Other Equipment										
420D 4WD Backhoe	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
CS563E Vibratory Roller	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
Light Truck - 1.5 Ton	\$ 63	\$ 63	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Supervisor's Truck	\$ 56	\$ 56	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Air Compressor + tools	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
Welding Equipment	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
Heavy Duty Drill Rig	\$ 392	\$ 392	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Pump (plugging) Drill Rig	\$ 392	\$ 392	\$ -	\$ -	\$ -	\$ -	1	\$ 2,358	\$ 4,717	
Concrete Pump	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
Gas Engine Vibrator	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
Generator 5KW	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
HDEP Welder (pipe or liner)	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
5 Ton Crane Truck	\$ 94	\$ 94	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
25 Ton Crane	\$ 135	\$ 135	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	
Trucks										
725	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
740	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 317		\$ -	\$ -	
769D	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 633		\$ -	\$ -	
777D (two transports) (8)	\$ 150	\$ 150	\$ 150	\$ 73,452	\$ 25	\$ 950		\$ -	\$ -	
613E (5,000 gal) Water Wagon	\$ 150	\$ 150	\$ 150	\$ -	\$ -	\$ -		\$ -	\$ -	
621E (8,000 gal) Water Wagon	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 633		\$ -	\$ -	
Dump Truck (10-12 yd ³)	\$ 112	\$ 112	\$ 112	\$ -	\$ -	\$ -		\$ -	\$ -	
Miscellaneous										
Equipment for dry hole abandonment (420D 4WD)	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -	
Pilot car (Light Truck)	\$ 56	\$ 56	\$ 56	\$ -	\$ -	\$ -		\$ -	\$ -	
Truck Tractor + Lowbed Trailer 75 ton	\$ 150	\$ 150	\$ 150	\$ -	\$ -	\$ -		\$ -	\$ -	
Truck Tractor + Flatbed Trailer 40 ton	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -	
Light Truck + Flatbed Trailer 25 ton	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -	
							2	\$	6,892	

Footnotes and explanations of assumptions

- (1) The sum of the cost of equipment from either the SRCE or RSM equipment tab plus Davis-Bacon labor tab
- (2) Assumes minimum of 30 minutes load and secure and 30 minutes unsecure and unload machine.
- (3) No "Deadhead" (empty) charge for Mob up to 50 miles. More than 50 miles the cost of deadhead same rate as loaded miles.
- (4) Only large equipment requires disassembly for transport. Includes cost of mechanic + mechanic's truck + crane operator + crane.
- (5) Nevada Dept. of Transportation overdimensional permits are \$25 per trip or \$60 per year.
- (6) Sum of mobilization plus all ancillary costs for one way loaded and return empty.
- (7) Two transports are required but the second transport does not need pilot cars or permits or a heavy duty trailer.
- (8) Two transports required with both requiring full complement of pilot cars and permits.
- (9) For large mining operations, mobilization may be required from more than one location. For example, the Elko yard may not have four 631 scrapers. Additional equipment may need to mobilize from Reno, Las Vegas, or Salt Lake City. Input the further distance here.
- (10) Pilot Car costs based on SRCE light truck costs and Davis-Bacon wages
- (11) SRCE costs based on July 2018 vendor quotes.
- (12) RS Means costs based on R.S. Means Heavy Construction Cost Data, 2018, Q2
- (13) Davis Bacon wages based on 2018 determination.

ATTACHMENT G



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
 Tonopah Field Office
 P.O. Box 911 (1553 South Main Street)
 Tonopah, Nevada 89049
 Phone: 775-482-7800 Fax: 775-482-7810
<https://www.blm.gov/nevada>



M. Jennings 10/17/18
ENumeration 17 OCT 18

In Reply Refer To:
 N-97262
 3809 (NVB02108)

OCT 17 2018

CERTIFIED MAIL – RETURN RECEIPT REQUESTED 7018 0360 0001 7288 4740

DECISION

Paradigm Minerals USA Corp.	:	43 CFR 3809 – Surface Management
Matt Weaver, Senior VP	:	Notice
241 Ridge St., #210	:	
Reno, NV 89501	:	

Determination of Required Financial Guarantee Amount

Description of Notice

The notice for the **South Infill Basin Exploration Project** was received in this office on October 2, 2018. The project area is located on public lands in Esmeralda County, Nevada in section 34, T. 1 S., R. 37 E. and section 3, T. 2 S., R. 37 E. Mount Diablo Meridian. The notice proposes carrying over existing disturbance, release from reclaimed and unused proposed disturbance from currently active notice N-95045; as well as new disturbance, consisting of exploration drilling, overland travel, and road building for a total combined area of **4.24 acres** of disturbance. The activation of this notice will close existing notice N-95045.

The proposed operations were reviewed by various resource specialists who have determined that the operation, as proposed, will not cause unnecessary or undue degradation as defined under 43 CFR 3809.5. The Bureau of Land Management (BLM) casefile number for your notice is **N-97262**. Please refer to this number in any future communication concerning this notice.

Please be advised that the State of Nevada has revised the requirements for drilling wells and sampling for dissolved mineral resources, effective January 1, 2018. In accordance with 43 CFR 3809.420(a)(6), "you must conduct all operations in a manner that complies with all pertinent Federal and state laws." We encourage you to contact the Nevada Division of Minerals (NDOM) at (775) 684-7040 or visit <http://minerals.nv.gov/Programs/DMRE/DMRE/> to learn more about these changes and ensure compliance with the requirement of § 3809.420(a)(6).

Amount of Financial Guarantee

A member of the Tonopah Field Office staff has reviewed your reclamation cost estimate and determined that a financial guarantee of \$34,838.00 is sufficient to complete reclamation of the proposed disturbance. The reclamation cost estimate for N-95045 is \$39,098, this notice will be

closed when the bond accepted and obligated for notice N-97262. The amount of the reclamation cost estimate is based on operator compliance with all applicable operating and reclamation requirements.

All line items contained in the reclamation cost estimate are not to be considered as the limits of financial guarantee expenditures in that respective category or task should forfeiture of the financial guarantee be necessary. The line items listed are solely for the purpose of arriving at a total amount for the financial guarantee. This total amount may be spent however the BLM deems necessary to implement the approved reclamation plan, and does not represent a reclamation cost limit or constraint.

The BLM's review of your proposed operations, determination that your notice filing is complete, determination that your operations as proposed will not cause unnecessary or undue degradation and decision concerning the amount of the required financial guarantee does not relieve you, the operator, of your responsibility to be in compliance with all applicable Federal, State and local laws and regulations, and to obtain all applicable Federal, State and local authorizations and permits. You are responsible for preventing any unnecessary or undue degradation of public lands and resources, and for reclaiming all lands disturbed by your operations.

Required Financial Guarantee

The BLM Nevada State Office currently holds BLM bond number NVB002108 with Paradigm Minerals USA Corp, as principal in the amount of \$39,098 for N-95045. The financial guarantee in the amount of \$34,838.00 must be filed and accepted, before you begin new surface disturbing operations, at the address below:

BLM -Nevada State Office
Branch of Mineral Resources (Solids)
1340 Financial Blvd.
Reno, Nevada 89502

You must receive *written notification* from that office accepting and obligating your financial guarantee before you may begin any surface disturbing operations. The types of financial instruments that are acceptable to the BLM are found at 43 CFR 3809.555. Please contact the BLM Branch of Mineral Resources (Solids) at (775) 861-6400 for further information on the adjudication of financial guarantees.

This decision does not constitute certification of ownership to any entity named in the notice; recognition of the validity of associated mining claims; or recognition of the economic feasibility of the proposed operations.

Term of Notice

Your notice will remain in effect for two years from the date of this decision, unless you notify this office beforehand that operations have ceased and reclamation is complete. If you wish to conduct operations for another two years after the expiration date of your notice, you must notify this office in writing on or before the expiration date as required by 43 CFR 3809.333.

Resource Conditions

Resource specific conditions are included as an attachment to this letter.

Guidelines for Operations Conducted under a Notice

The enclosed document provides additional guidelines concerning your notice, as well as, specific resource guidelines specific to this geographic area.

Appeal of the Decision

If you are adversely affected by this decision, you may request that the BLM Nevada State Director review this decision. If you request a State Director Review, the request must be received in the BLM Nevada State Office at 1340 Financial Blvd., Reno, Nevada 89502, no later than 30 calendar days after you receive or have been notified of this decision. The request for State Director Review must be filed in accordance with the provisions in 43 CFR 3809.805. This decision will remain in effect while the State Director Review is pending, unless a stay (suspension) is granted by the State Director. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

If the State Director does not make a decision on your request for review of this decision within 21 days of receipt of the request, you should consider the request declined and you may appeal this decision to the Interior Board of Land Appeals (IBLA). You may contact the BLM Nevada State Office to determine when the BLM received the request for State Director Review. You have 30 days from the end of the 21-day period in which to file your Notice of Appeal with this office at P.O. Box 911, 1553 S. Main St, Tonopah, NV 89049, which we will forward to IBLA.

If you wish to bypass a State Director Review, this decision may be appealed directly to the IBLA in accordance with the regulations at 43 CFR 3809.801(a) (1). Your Notice of Appeal must be filed in this office at P.O. Box 911, 1553 S. Main St, Tonopah, NV 89049, within 30 days from receipt of this decision. As the appellant you have the burden of showing that the decision appealed from is in error. Enclosed is BLM Form 1842-1 that contains information on taking appeals to the IBLA.

This decision will remain in effect while the IBLA reviews the case, unless a stay is granted by the IBLA. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Request for a Stay

If you wish to file a petition (request) pursuant to regulations 43 CFR 4.21 for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by IBLA, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of this notice of appeal and petition for a stay must also be submitted to each party named in the decision and to the IBLA and to the appropriate Office of the Solicitor (see 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal must show sufficient justification based on the following standards:

1. The relative harm to parties if the stay is granted or denied.
2. The likelihood of the appellant's success on the merits.
3. The likelihood of immediate and irreparable harm if the stay is not granted.
4. Whether the public interest favors granting the stay.

If you have any questions, please contact Earl C. Numinen, Assistant Field Manager, Non-Renewable Resources, at (775) 482-7800.

Earl C. Numinen

Timothy J. Coward
Field Manager

Enclosures

cc:

BLM Nevada
Branch of Mineral Resources (Solids)

Lowell Price
Fluid Minerals Program Manager
Nevada Division of Minerals
400 West King Street, Suite 106
Carson City, Nevada 89703-4212

**Closure Cost Estimate
Property Information**

Enter Data Below in Green and Blue Spaces

STANDARDIZED RECLAMATION COST ESTIMATOR

Version 1.4.1

Build 017b (revised to work with Excel 2016 - 24 Oct 2016)

Approved for use in Nevada, August 1, 2012

COST DATA FILE INFORMATION

File Name:	<u>2017 SRCE_Version_1_4_1_017_NV.xlsm</u>		
Cost Data File:	<u>SRCE_Cost_Data_File_1_12_Std_2018.xlsm</u>		
Cost Data Date:	<u>August 1, 2018</u>		
Cost Data Basis:	<u>User Data</u>	Data Cost Units:	<u>Imperial</u>
Author/Source:	<u>Nevada Division of Environmental Protection (NDEP) & NV BLM</u>		

PROJECT INFORMATION

Property/Mine Name:	<u>South Infill Notice</u>	Property Code:	<u></u>
Project Name:	<u>South Infill Basin Exploration Project</u>		
Date of Submittal:	<u>10/2/2018</u>	Average Altitude:	<u>6000</u> ft.
Select One:	<input checked="" type="checkbox"/> Notice or Sm Exploration Plan <input type="checkbox"/> Lg Exploration Plan <input type="checkbox"/> Mine Operation		
Select One:	<input checked="" type="checkbox"/> Private Land <input checked="" type="checkbox"/> Public or Public/Private		
Cost Estimate Type:	<u>Surety</u>		
Cost Basis Category:	<u>S. Nevada Notice Level</u> -		
Clark, Esmeralda, Lincoln and Nye Counties			
Cost Basis Description:			

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**Closure Cost Estimate
Cost Summary**

Project Name: South Infill Basin Exploration Project
Project Date: 10/2/2018
Model Version: Version 1.4.1
File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm

A. Earthwork/Recontouring	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Exploration	\$1,898	\$3,329	\$739	\$5,766
Exploration Roads & Drill Pads	\$2,861	\$4,432	\$0	\$7,293
Roads	\$0	\$0	\$0	\$0
Well Abandonment	\$766	\$264	\$6	\$1,036
Pits	\$0	\$0	N/A	\$0
Quarries & Borrow Areas	\$0	\$0	\$0	\$0
Underground Openings	\$0	\$0	\$0	\$0
Process Ponds	\$0	\$0	\$0	\$0
Heaps	\$0	\$0	\$0	\$0
Waste Rock Dumps	\$0	\$0	\$0	\$0
Landfills	\$0	\$0	\$0	\$0
Tailings	\$0	\$0	\$0	\$0
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Yards, Etc.	\$0	\$0	\$0	\$0
Drainage & Sediment Control	\$0	\$0	\$0	\$0
Generic Material Hauling	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				
Subtotal	\$5,325	\$8,025	\$745	\$14,095
Mob/Demob if included in Other User sheet	\$0	\$0	\$0	\$0
Mob/Demob	\$3,448	\$3,448		\$6,896
Subtotal "A"	\$8,771	\$11,471	\$745	\$20,987
B. Revegetation/Stabilization	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Exploration	\$0	\$0	\$0	\$0
Exploration Roads & Drill Pads	\$576	\$219	\$1,757	\$2,552
Roads	\$0	\$0	\$0	\$0
Well Abandonment				N/A
Pits	\$0	\$0	\$0	\$0
Quarries & Borrow Areas	\$0	\$0	\$0	\$0
Underground Openings				N/A
Process Ponds	\$0	\$0	\$0	\$0
Heaps	\$0	\$0	\$0	\$0
Waste Rock Dumps	\$0	\$0	\$0	\$0
Landfills	\$0	\$0	\$0	\$0
Tailings	\$0	\$0	\$0	\$0
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Yards, Etc.	\$0	\$0	\$0	\$0
Drainage & Sediment Control	\$0	\$0	\$0	\$0
Generic Material Hauling	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "B"	\$576	\$219	\$1,757	\$2,552
C. Detoxification/Water Treatment/Disposal of Wastes**	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Process Ponds/Sludge				\$0
Heaps				\$0
Dumps (Waste & Landfill)				\$0
Tailings				\$0
Surplus Water Disposal				\$0
Monitoring				\$0
Miscellaneous				\$0
Solid Waste - On Site	\$0	\$0	N/A	\$0
Solid Waste - Off Site				\$0
Hazardous Materials				\$0
Hydrocarbon Contaminated Soils	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "C"	\$0	\$0	\$0	\$0
D. Structure, Equipment and Facility Removal, and Misc.	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Foundation & Buildings Areas	\$0	\$0	\$0	\$0
Other Demolition	\$0	\$0	\$0	\$0
Equipment Removal	\$0	\$0	\$0	\$0
Fence Removal	\$0	\$0	\$0	\$0
Fence Installation	\$0	\$0	\$0	\$0
Culvert Removal	\$0	\$0	N/A	\$0
Pipe Removal	\$0	\$0	N/A	\$0
Powerline Removal	\$0			\$0
Transformer Removal	\$0			\$0
Rip-rap rock lining gabions	\$0	\$0	\$0	\$0
Other Misc. Costs	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "D"	\$0	\$0	\$0	\$0
E. Monitoring	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials	Total
Reclamation Monitoring and Maintenance	\$4,148	\$503	\$176	\$4,827
Ground and Surface Water Monitoring	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Subtotal "E"	\$4,148	\$503	\$176	\$4,827
F. Construction Management & Support	Labor	Equipment ⁽²⁾	Materials	Total
Construction Management	\$0	\$0	N/A	\$0
Construction Support	\$0	\$0	\$0	\$0
Road Maintenance	\$0	\$0	\$0	\$0
Other User Costs (from Other User sheet)	\$0	\$0	\$0	\$0
Other**				\$0
Subtotal "F"	\$0	\$0	\$0	\$0
Subtotal Operational & Maintenance Costs	Labor ⁽¹⁾	Equipment ⁽²⁾	Materials ⁽³⁾	Total
Subtotal A through F	\$13,495	\$12,193	\$2,678	\$28,366

** Other Operator supplied costs - additional documentation required.

**Closure Cost Estimate
Cost Summary**

Project Name: South Infill Basin Exploration Project

Project Date: 10/2/2018

Model Version: Version 1.4.1

File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm

Indirect Costs		Include?	Total	
1. Engineering, Design and Construction (ED&C) Plan (7)			N/A	
2. Contingency (8)			N/A	
3. Insurance (9)	\$202		\$202	
4. Performance Bond (10)			N/A	
5. Contractor Profit (11)			\$2,837	
6. Contract Administration (12)			\$2,837	
7. Government Indirect Cost (13)			\$596	
Subtotal Add-On Costs			\$6,472	
Total Indirect Costs as % of Direct Cost			23%	
GRAND TOTAL			\$34,838	
Administrative Cost Rates (%)				
	Cost Ranges for Indirect Cost Percentages			
	<B	<B	
1. Engineering, Design and Construction (ED&C) Plan (7)	\$1,000,000	\$25,000,000	\$25,000,000	Small Plan
Variable Rate	8%	6%	4%	0%
	<B	<B	
2. Contingency (8)	\$500,000	\$5,000,000	\$50,000,000	Small Plan
Variable Rate	10%	8%	6%	4%
3. Insurance (9)	1.5% of labor costs			
4. Bond (10)	3.0% of the O&M costs if O&M costs are >\$100,000			
5. Contractor Profit (11)	10% of the O&M costs			
	<B	<B	
6. Contract Administration (12)	\$1,000,000	\$25,000,000	\$25,000,000	
Variable Rate	10%	8%	6%	
Government Indirect Cost (13)	21% of contract administration			

RECLAMATION COST ESTIMATION SUMMARY SHEET FOOTNOTES

1. Federal construction contracts require Davis-Bacon wage rates for contracts over \$2,000. Wage rate estimates may include base pay, payroll loading.
2. The reclamation cost estimate must include the estimated plugging cost of at least one drill hole for each active drill rig in the project area. Where the
3. Miscellaneous items should be itemized on accompanying worksheets.
4. Fluid management should be calculated only when mineral processing activities are involved. Fluid management represents the costs of maintaining proper
5. Handling of hazardous materials includes the cost of decontaminating, neutralizing, disposing, treating and/or isolating all hazardous materials used, produced.
6. Any mitigation measures required in the Plan of Operations must be included in the reclamation cost estimate. Mitigation may include measures to avoid,
7. Engineering, design and construction (ED&C) plans are often necessary to provide details on the reclamation needed to contract for the required work. To
8. A contingency cost is included in the reclamation cost estimation to cover unforeseen cost elements. Calculate the contingency cost as a percentage of the
9. Insurance premiums are calculated at 1.5% of the total labor costs. Enter the premium amount if liability insurance is not included in the itemized unit costs.
10. Federal construction contracts exceeding \$100,000 require both a performance and a payment bond (Miller Act, 40 USC 270a et seq.). Each bond premium is
11. For Federal construction contracts, use 10% of estimated O&M cost for the contractor's profit.
12. To estimate the contract administration cost, use 6 to 10% of the operational and maintenance (O&M) cost. Calculate the contract administration cost as a
13. Government indirect cost rate is 21% of the contract administration costs.

**Closure Cost Estimate
Reclamation Quantities**

Project Name: South Infill Basin Exploration Project-Notice of Exploration
 Date of Submission: 10/2/2018
 File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm
 Model Version: Version 1.4.1
 Data Cost File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: \$, Nevada Notice Level

Reclamation Quantity Summary

Description												Unit Costs				
	Total Regrade or Haul Volume CY	Total Regrade or Haul Cost \$	Total Cover Volume CY	Cover Placement Cost \$	Total Growth Media Volume CY	Growth Media Placement Cost \$	Total Surface Area acres	Total Security Cost \$	Total Reclamation Cost \$	TOTALS \$	Regrade Unit Cost \$/CY	Material Haul or Backfill Unit Cost \$/CY	Cover Unit Cost \$/CY	Growth Media Unit Cost \$/CY	Security Unit Cost \$/CY	Area Unit Cost \$/acre
1. Active Rock Dumps	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
2. Tailings Impoundments	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
3. Inactive Leach Piles	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
4. Open Pits	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
5. Openings & Surface Pits	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
6. Roads	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
7. Landfills	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
8. Windbreaks	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
9. Yards	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
10. Ponds	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
11. Exploration Roads	6,782	3	7,293	-	3	-	4.84	3	-	3	0.645	\$1.08	-	-	\$0.00	\$2.034
12. Exploration Trenches	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
13. Checkmate Ditches	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
14. Sediment Ponds	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
15. General Haulage Backfill	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
16. Acid Decline Backfilling	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
17. Slurry Backfilling	3	-	3	-	3	-	3	-	3	-	-	N/A	-	-	-	-
TOTALS	6,782	3	7,293	-	3	-	4.84	3	-	3	0.645	\$1.08	-	-	\$0.00	\$2.034
Average Cost	per CY	\$1.50	per CY	-	per CY	-	per acre	\$2.00	-	-	per acre	\$1.034	-	-	-	-

**Closure Cost Estimate
Exploration**

Project Name: South Infill Basin Exploration Project- Notice or Exploration

Date of Submittal: 10/2/2018

File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm

Model Version: Version 1.4.1

Cost Data: User Data

Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm

Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration - Cost Summary				
	Labor	Equipment	Materials	Totals
Hole Abandonment Costs	\$1,698	\$3,329	\$729	\$5,756
Trench Backfilling Costs	\$0	\$0	\$0	\$0
Subtotal Earthworks	\$1,698	\$3,329	\$729	\$5,756
Trench Re-vegetation Costs	\$0	\$0	\$0	\$0
TOTALS	\$1,698	\$3,329	\$729	\$5,756

Exploration Drillhole Abandonment - User Input									
Facility Description			Hole Plugging						
Description (required)	ID Code	Hole Type (select)	Diameter in	Total Number of Holes	Max Holes Open at One Time	Casing to Remove ft	Average Depth of Hole ft bgs	Depth to Water ft bgs	Hole Plug Method (select)
1 Open Drill Holes		Reverse Circ	6.5	48.0	2.0	0.0	1,800.0	160.0	Grout + Backfill

Notes:

1. If core holes are pre-drilled, use length of hole below pre-drilled length.

2. If Top Plug is selected, assumes maximum 1.2hr labor time to place plug and backfill with cuttings/sol (including move-to/set up time).

Up to two holes will be open at any given time.

Assuming an average of two holes drilled per pad (2x28=56)

**Closure Cost Estimate
Exploration**

Project Name: South Infill Basin Exploration Project-Notice of Exploration
 Date of Submittal: 10/2/2018
 File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration - Cost Summary				
	Labor	Equipment	Materials	Totals
Hole Abandonment Costs	\$1,698	\$3,329	\$739	\$5,766
Trench Backfilling Costs	\$0	\$0	\$0	\$0
Subtotal Earthworks	\$1,698	\$3,329	\$739	\$5,766
Trench Re-vegetation Costs	\$0	\$0	\$0	\$0
TOTALS	\$1,698	\$3,329	\$739	\$5,766

Exploration Drillhole Abandonment														
	Description (required)	Volume of depth ft	Hole Plugging Material	Total Grout Volume cy	Total Cuttings Volume cy	Total Top Seal Volume cy	Total Drillhole Abandonment Hours hrs	Casing Removal Labor Cost \$	Casing Removal Equipment Cost \$	Plugging Labor Cost \$	Plugging Equipment Cost \$	Plugging Material Cost \$	Top Seal Material Cost \$	Total Cost \$
1	Open Drill Holes	0.200	Grout + Cuttings	6.80	0.22	0.19	7	\$0	\$0	\$1,698	\$3,329	\$739	\$14	\$5,766
				6.90	0.22	0.19	7	\$0	\$0	\$1,698	\$3,329	\$739	\$14	\$5,766

Notes

1. Assumes grout backfill from bottom of hole to 50' (15.24m) above static water level, up to 10' (3m) from top of hole.
2. Assumes 25% loss to formation for grout backfill.
3. If "Top Plug" hole plug method is used, assumes physical plug installed without backfill, grout or cement. Not a viable option for Nevada projects.
4. Assumes top 20' (6 m) of hole is plugged with cement if "Grout Only", "Backfill + Grout", or "Cement Plug" hole plug methods are chosen.
5. Assumes that a) casing is not cemented entire length, b) does not include temporary surface casing.
6. Assumes minimum 1 hr per hole for abandonment (excluding move-to and casing removal).
7. Assumes fixed hours per hole for setup & tear-down and moving between holes (see Productivity Sheet); per drill hole includes time if grouting required, labor crew only, if cuttings backfill only.

**Closure Cost Estimate
Expl. Roads & Pads**

Project Name: South Infill Basin Exploration Project- Notice of Exploration
 Date of Submittal: 10/2/2018
 File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary				
	Labor	Equipment	Materials	Totals
Loading Costs	\$7,861	\$4,432	N/A	\$12,293
Cover Placement Cost	\$5	\$5	N/A	\$10
Regrading Surface Cost	\$5	\$5	N/A	\$10
Subtotal Earthworks	\$12,861	\$4,432		\$17,293
Vegetation Cost	\$5,760	\$210	\$1,757	\$7,727
TOTALS	\$18,621	\$4,642	\$1,757	\$24,960

Exploration Roads & Pads - User Input															
You must fill in ALL green cells and relevant blue cells in this section for each road															
Facility Description		Physical (1) - MANDATORY										User Overrides			
Description (Required)	ID Code	Underlying Ground Slope % grade	Ungraded Slope % TV	Cut Slope degrees	Road + Dril Pad Length ft	Road Width ft	Number of Dril Pads	Individual Sump Volume cy	Dril Pad Width ft	Dril Pad Length ft	Slope Replacement Percent %	Regrade Volume (if calculated elsewhere) cy	Disturbed Area (if calculated elsewhere) acres	Growth Media Thickness in	Distance to Growth Media Backslope ft
1 As-Built Surface Disturbance from NWH-00000		18.0	1.3	38.0	6,000	12.0	0	0	58.0	61	100%		2.01		
2 Planned water bladder laydown area		6.0	1.3	38.0	81	8.0	1	0	88.0	61	100%				
3 Planned constructed roads and drill sites		18.0	1.3	38.0	4,064	12.0	24	24	64.0	60	100%				

- Notes:
1. All Physical parameters must be input even if manual overrides for volume or area are used.
 2. Slope replacement refers to the percentage of cut volume replaced during regrading.
 3. If Slope from facility to borrow source is >20, downhill travel time may be underestimated due to limitation of uphill travel time curves and downhill speed tables from CA7 Handbook (see Productivity Sheet).
 4. Sump volume will be applied to all roads on slopes >22%. On slopes >22% pad width (i.e. cut volume) should be adequate to account for sump volume.

**Closure Cost Estimate
Expl. Roads & Pads**

Project Name: South Infill Basin Exploration Project- Notice of Exploration
 Date of Submittal: 10/2/2018
 File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary				
	Labor	Equipment	Materials	Totals
Grading Costs	\$7,861	\$4,431	N/A	\$12,292
Cover Placement Cost	0	0	N/A	0
Rippling Scarifying Cost	0	0	N/A	0
Revegetation Costs	\$1,881	\$4,431		\$6,312
TOTALS	\$9,742	\$8,862	\$1,757	\$20,361

Exploration Roads & Pads - User Input (cont.)												
You must fill in ALL green cells and relevant blue cells in this section for each road												
Description (required)	Regrade Material Condition (select)	Grading			Growth Media				Revegetation			
		Est Material Type (select)	Recontouring Equipment Fleet (select)	Additional hrs for Work	Growth Media Material Type (select)	Plant Equipment Fleet (select)	Maximum Plant Size (select on screen)	Additional hrs for Work	Seed Mix (select)	Mulch (select)	Fertilizer (select)	Scarifying/ Ripping? (select)
1. As-Built Surface Disturbance from NWH-99048	1	LS - broken	Small Dozer	1.8					Mix 3	None	None	No
2. Planned water bladder laydown area	1	LS - broken	Small Dozer						Mix 3	None	None	No
3. Planned constructed roads and drill sites	1	LS - broken	Small Dozer						Mix 3	None	None	No

Notes

1. Include gross hours necessary to work equipment in from drop-off point to work area
2. Material Types are used for density correction based on material densities in Caterpillar Performance Handbook material density table

**Closure Cost Estimate
Expl Roads & Pads**

Project Name: South Infill Basin Exploration Project- Notice of Exploration
 Date of Submittal: 10/2/2018
 File Name: 2017 SRCE_Version_1_4_1_017_NV.slam
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Sld_2018.slam
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary				
	Labor	Equipment	Materials	Totals
Grading Costs	\$1,861	\$4,431	NA	\$7,291
Cover Placement Cost	\$25	\$50	NA	\$75
Rough Scar/Fill Cost	\$25	\$50	NA	\$75
Infill & Difficulties	\$1,281	\$4,431		\$7,291
Revegetation Cost	\$1,761	\$2,751	\$1,751	\$7,561
TOTALS	\$3,437	\$4,481	\$1,751	\$10,249

Exploration Roads & Pads - Regrading Costs										
	Description (Required)	Total Road Length ft	Total Drill Pad Length ft	Regrading Volume cu yd	Recommending Fleet	Equipment Productivity cu yd/hr	Total Equipment Hours ⁽¹⁾ hr	Total Labor Cost \$	Total Equipment Cost \$	Total Regrading Cost \$
1	1A-Build Surface Disturbance from M/N-05000	4,217	453	2,201	CBM	65	14	\$1,027	\$1,991	\$2,018
2	Planned water bladder laydown area	0	0	0	DMR	12	1	\$75	\$75	\$75
3	Planned extra tracked roads and drill sites	2,844	1,200	2,500	DMR	68	24	\$1,761	\$2,751	\$4,512
		7,061	1,743	6,701			39	\$2,863	\$4,817	\$7,291

(1) Includes walk-in time based on distance and travel speed (see Productivity sheet for speeds)

**Closure Cost Estimate
Expl. Roads & Pads**

Project Name: South Infill Basin Exploration Project- Notice or Exploration
Date of Submittal: 10/2/2018
File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm
Model Version: Version 1.4.1
Cost Data: User Data
Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Exploration Roads & Pads - Cost Summary				
	Labor	Equipment	Materials	Totals
Grading Costs	\$2,667	\$4,431	7% A	\$7,261
Cover Placement Cost	32	32	7% A	64
Ripping Scarifying Cost	32	32	7% A	64
Subtotal Equipment	\$1,281	\$4,433		\$7,393
Revegetation Cost	\$578	\$219	\$175	\$1,952
TOTALS	\$3,437	\$4,481	\$1,787	\$9,446

Exploration Roads & Pads - Scarifying/Revegetation Costs											
	Description (required)	Surface Area acres	Ripping/ Scarifying Feet	Ripping Hours hrs	Ripping Labor Cost \$	Ripping Equipment Cost \$	Total Ripping Costs \$	Revegetation Labor Cost \$	Revegetation Equipment Cost \$	Revegetation Material Cost \$	Total Revegetation Cost \$
1	As-Built Surface Disturbance from NVR-06046	2.01						\$201	\$76	\$730	\$1,007
2	Planned water bladder laydown area	0.06						\$100	\$30	\$29	\$157
3	Planned constructed roads and drill sites	2.75						\$375	\$105	\$960	\$1,315
		4.82			60	13	73	\$676	\$211	\$1,787	\$2,667

Closure Cost Estimate Monitoring

Project Name: South Infill Basin Exploration Project- Notice or Exploration

Date of Submittal: 10/2/2018

File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm

Model Version: Version 1.4.1

Cost Data: User Data

Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm

Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Reclamation Monitoring & Maintenance - Cost Summary				
	Labor	Equipment	Lab & Materials	Totals
Revegetation Maintenance	\$49	\$19	\$178	\$246
Erosion Maintenance	\$0	\$0	N/A	\$0
Reclamation Monitoring	\$4,100	\$485	N/A	\$4,585
Subtotal Reclamation Monitoring	\$4,149	\$504	\$178	\$4,831
Water Quality Monitoring	\$0	\$0	\$0	\$0
TOTAL MONITORING	\$4,149	\$504	\$178	\$4,831

Reclamation Maintenance								
Description	Total Revegetation Surface Area (1,2) acres	% Area Requiring Reseeding	Seed Mix (select)	Area Requiring Reseeding acres	Seed \$/acres	Labor \$/acres	Equipment \$/acres	Totals \$
Revegetation Maintenance	5	10%	Mix 3	0.5	\$363.00	\$100.00	\$38.00	
Labor								\$49
Equipment								\$19
Materials								\$178
Cost/Acre								\$501
							Subtotal	\$246

Notes: 1) Surface area is NOT the same as footprint disturbance area typically used for permitting purposes.

	Total Volume Growth Media cy	% Volume Requiring Maintenance	Average Growth Media Placement Cost \$/cy	Volume Requiring Replacement cy		Labor (assume 25%) \$/acres	Equipment (assume 75%) \$/acres	Total \$
Erosion Maintenance	0		\$0.00	0		\$0.00	\$0.00	\$0

Notes:

Reclamation Monitoring					
Description	Hrs/Day	Days/Year	Number of Years	Rate \$/hr	
Field Work					
Field Geologist/Engineer				\$149.49	\$0
Range Scientist	6	1	3	\$136.68	\$2,460
Reporting					
Field Geologist/Engineer				\$149.49	\$0
Range Scientist	4	1	3	\$136.68	\$1,640
					Subtotal \$4,100
Travel					
	Hrs/Trip	Trips/Year	Years	Truck Cost \$/hr	
Travel	6	1	3	\$26.97	\$485
					Subtotal \$485
Total Reclamation Monitoring					\$4,585
Notes:					

10/16/2018

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1 of 1

Monitoring

**Closure Cost Estimate
Labor Rates**

Project Name: South Infill Basin Exploration Project-Notice of Exploration
 Date of Submittal: 10/2/2018
 File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S. Nevada Notice Level

Color Code Key	
User Input - Direct Input	Direct Input
User Input - Pull Down List	Pull Down Selection
Program Constant (can override)	Alternate Input
Program Calculated Value	Locked Cell - Formula or Reference

ZONE ADJUSTMENTS		
Cost Basis/Project Region	S. Nevada Notice	Clark, Esmeralda, Lincoln and Nye Counties
Power Equipment Operators	>80 miles	\$3.50
Truck Drivers	>70 miles	\$3.50
Laborers	>80 miles	\$3.25
INDIRECT COSTS		
Unemployment (%)	3.00%	
Retirement/SS/Medicare (%)	7.65%	
Workman's Compensation (%)	0.075	
Other Indirects		
State Payroll Tax (13)(15)(17)(1)		
Total Other Indirects	0.00%	

HOURLY LABOR RATE TABLE										
EQUIPMENT TYPE (1) OR JOB DESCRIPTION	Labor Group	Base Rate (\$/hr)	Zone Adjustment (\$/hr)	Hourly Wage (\$/hr)	Fringe (\$/hr)	Retirement/ Medicare (\$/hr)	Unemployment Insurance (\$/hr)	Workman's Compensation (\$/hr)	Other Indirect Costs (\$/hr)	Total (\$/hr)
Equipment Operators (\$/hr) (2)										
Bulldozers										
D6R	Group 8	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.68	\$0.00	\$73.39
D6R w/ Winch					\$0.00					
D7R	Group 8	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.68	\$0.00	\$73.39
D8R	Group 8	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.68	\$0.00	\$73.39
D9R	Group 8	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.68	\$0.00	\$73.39
D10R	Group 8	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.68	\$0.00	\$73.39
D11R	Group 8	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.75	\$4.68	\$0.00	\$73.39
Wheeled Dozers										
824G					\$0.00					
834G					\$0.00					
844					\$0.00					
854G					\$0.00					
Motor Graders										
120H	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
143H	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
160H	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.67
24M					\$0.00					
Track Excavators										
312C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.97
320C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.97
325C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.97
330C	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.97
345B	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.97
365BL					\$0.00					
385BL	Group 12	\$59.02	\$3.50	\$62.52	\$0.00	\$1.88	\$4.78	\$4.69	\$0.00	\$73.97
Scrapers										
631G	Group 15	\$59.23	\$3.50	\$62.73	\$0.00	\$1.88	\$4.80	\$4.70	\$0.00	\$74.12
637G	Group 15	\$59.23	\$3.50	\$62.73	\$0.00	\$1.88	\$4.80	\$4.70	\$0.00	\$74.12
Wheeled Loaders										
924G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
928G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
950G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
966G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
972G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
980G	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.78	\$4.67	\$0.00	\$73.52
988G	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.87
990					\$0.00					
992G	Group 10	\$58.85	\$3.50	\$62.35	\$0.00	\$1.87	\$4.77	\$4.68	\$0.00	\$73.87
994D					\$0.00					
L235D					\$0.00					
Shovels										
PC2000					\$0.00					
PC3000					\$0.00					
PC4000					\$0.00					
PC5500					\$0.00					
PC8000					\$0.00					
Hydraulic Hammers										
H-120 (fts 325)										
H-160 (fts 345)										
H-180 (fts 365/385)										
Demolition Shears										
S340 (fts 322/325/330)										
S365 (fts 330/345)										
S380 (fts 365/385)										
Demolition Grapples										
G315 (fts 322/325)										
G320 (fts 325/330)										
G330 (fts 345/365)										

Closure Cost Estimate Labor Rates

Project Name: South Infill Basin Exploration Project- Notice or Exploration
 Date of Submittal: 10/2/2018
 File Name: 2017 SRCE_Version_1_4_1_017_NV.xlsm
 Model Version: Version 1.4.1
 Cost Data: User Data
 Cost Data File: SRCE_Cost_Data_File_1_12_Std_2018.xlsm
 Cost Estimate Type: Surety Cost Basis: S, Nevada Notice Level

Color Code Key	
User Input - Direct Input	Direct Input
User Input - Pull Down List	Pull Down Selection
Program Constant (can override)	Alternate Input
Program Calculated Value	Locked Cell - Formula or Reference

ZONE ADJUSTMENTS			
Cost Basis/Project Region	S, Nevada Notice	Clark, Esmeralda, Lincoln and Nye Counties	
Power Equipment Operators	>60 miles	\$3.50	
Truck Drivers	>70 miles	\$3.50	
Laborers	>50 miles	\$3.25	
INDIRECT COSTS			
Unemployment (%)	3.00%		
Retirement/SS/Medicare (%)	7.85%		
Workman's Compensation (%)	0.075		
Other Indirects			
State Payroll Tax (13.1/15.1/17.1)			
Total Other Indirects	0.00%		

HOURLY LABOR RATE TABLE										
Other Equipment										
420D 4WD Backhoe	Group 4	\$58.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00	\$73.13
428D 4WD Backhoe	Group 4	\$58.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00	\$73.13
C5533E Vibratory Roller	Group 4	\$58.40	\$3.50	\$61.90	\$0.00	\$1.86	\$4.74	\$4.64	\$0.00	\$73.13
C5633E Vibratory Roller					\$0.00					
CP533E Sheepsfoot Compactor					\$0.00					
CP633E Sheepsfoot Compactor					\$0.00					
Light Truck - 1.5 Ton					\$0.00					
Supervisor's Truck					\$0.00					
Flashed Truck					\$0.00					
Air Compressor - tools	Group 1	\$51.87	\$3.50	\$55.37	\$0.00	\$1.78	\$4.53	\$4.44	\$0.00	\$69.81
Welding Equipment	Group 8	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.76	\$4.66	\$0.00	\$73.39
Heavy Duty Drill Rig	Group 2	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.76	\$4.66	\$0.00	\$73.39
Pump, plugger, Drill Rig	Group 2	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.76	\$4.66	\$0.00	\$73.39
Concrete Pump					\$0.00					
Gas Engine Vibrator	Group 8	\$58.62	\$3.50	\$62.12	\$0.00	\$1.86	\$4.76	\$4.66	\$0.00	\$73.39
Generator 5KW					\$0.00					
HDEP Welder (pipe or liner)					\$0.00					
5 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.60
20 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.60
50 Ton Crane	Group 8	\$58.73	\$3.50	\$62.23	\$0.00	\$1.87	\$4.76	\$4.67	\$0.00	\$73.60
120 Ton Crane					\$0.00					

NOTES

- (1) Equipment Type: Challenger model or equivalent, LeTourneau
 (2) Equipment Operator Source: D-6 NV1800-01052018
 (3) Zone Basis: From Las Vegas City Hall

Truck Drivers (\$/hr) (4)										
725	Group 4	\$46.82	\$3.50	\$50.32	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
730	Group 4	\$46.82	\$3.50	\$50.32	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
735	Group 4	\$46.82	\$3.50	\$50.32	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
740	Group 4	\$46.82	\$3.50	\$50.32	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
769D	Group 4	\$46.82	\$3.50	\$50.32	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
773E					\$0.00					
777D	Group 4	\$46.82	\$3.50	\$50.32	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
785C					\$0.00					
793C					\$0.00					
797B					\$0.00					
613E (5,000 gal) Water Wagon	Group 3	\$46.44	\$3.50	\$49.94	\$0.00	\$1.50	\$3.81	\$3.75	\$0.00	\$58.95
621E (8,000 gal) Water Wagon	Group 4	\$46.82	\$3.50	\$50.32	\$0.00	\$1.50	\$3.83	\$3.76	\$0.00	\$59.22
727D Water Truck					\$0.00					
785C Water Truck					\$0.00					
Dump Truck (10-12 yd3)	Group 2	\$46.23	\$3.50	\$49.73	\$0.00	\$1.49	\$3.80	\$3.73	\$0.00	\$58.76

NOTES:

- (4) Truck Driver Source: D-6 NV1800-01052018
 (5) Zone Basis: From Las Vegas City Hall

2018 MOB/DEMOB using R.S. MEANS and SRCE equipment and DAVIS-BACON wages											
blue font is for project specific user input											
Miles from Washoe County Courthouse to project, one way										293	
Miles from equipment rental yard to project, one way (9)										276	
PMU South Infill Basin - October 2018, Mob from Las Vegas											
Hours travel time @ 55 MPH										5.03	
Equipment	Mobilization \$/hour (1)	\$ Flat Rate load & unload (2)	\$/hour Deadhead (empty return cost (3))	Disassembly and assembly (4)	Permit cost \$ (5)	Pilot car costs	# of units	One Way Mob Cost	Total Mob and Demob Cost		
Bulldozers											
D6R	\$ 98	\$ 99	\$ 99	\$ -	\$ -	\$ -	1	\$ 1,088	\$ 2,175		
D7R	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 455		\$ -	\$ -		
D8R	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 633		\$ -	\$ -		
D9R	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 633		\$ -	\$ -		
D10R	\$ 150	\$ 150	\$ 150	\$ 65,940	\$ 25	\$ 950		\$ -	\$ -		
D11R (two transports) (7)	\$ 150	\$ 150	\$ 150	\$ 139,848	\$ 25	\$ 633		\$ -	\$ -		
Motor Graders											
14G/H	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -		
16G/H	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 317		\$ -	\$ -		
Track Excavators											
320C	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -		
325C	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -		
345B	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 633		\$ -	\$ -		
385BL	\$ 150	\$ 150	\$ 150	\$ 48,260	\$ 25	\$ 633		\$ -	\$ -		
Scrapers											
631G	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 633		\$ -	\$ -		
637G PP	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 633		\$ -	\$ -		
Wheeled Loaders											
928G	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -		
966G	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -		
972G	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -		
988G	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 317		\$ -	\$ -		
992G (two transports) (7)	\$ 150	\$ 150	\$ 150	\$ 78,440	\$ 25	\$ 633		\$ -	\$ -		
Hydraulic Hammers											
H-120 (fits 325) no charge, mobilize with mach	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -		
H-180 (fits 345) no charge, mobilize with mach	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -		
H-180 (fits 365/385) no charge, mobilize with m	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -		
Other Equipment											
420D 4WD Backhoe	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -		
CS563E Vibratory Roller	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -		
Light Truck - 1.5 Ton	\$ 83	\$ 83	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -		
Supervisor's Truck	\$ 56	\$ 56	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -		
Air Compressor + tools	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -		
Welding Equipment	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -		
Heavy Duty Drill Rig	\$ 392	\$ 392	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -		
Pump (plugging) Drill Rig	\$ 392	\$ 392	\$ -	\$ -	\$ -	\$ -	1	\$ 2,350	\$ 4,717		
Concrete Pump	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -		
Gas Engine Vibrator	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -		
Generator 5KW	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -		
HDEP Welder (pipe or liner)	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -		
5 Ton Crane Truck	\$ 94	\$ 94	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -		
25 Ton Crane	\$ 135	\$ 135	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -		
Trucks											
725	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -		
740	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 317		\$ -	\$ -		
769D	\$ 128	\$ 128	\$ 128	\$ -	\$ 25	\$ 633		\$ -	\$ -		
777D (two transports) (8)	\$ 150	\$ 150	\$ 150	\$ 73,452	\$ 25	\$ 950		\$ -	\$ -		
813E (5,000 gal) Water Wagon	\$ 150	\$ 150	\$ 150	\$ -	\$ -	\$ -		\$ -	\$ -		
821E (8,000 gal) Water Wagon	\$ 150	\$ 150	\$ 150	\$ -	\$ 25	\$ 633		\$ -	\$ -		
Dump Truck (10-12 yd ³)	\$ 112	\$ 112	\$ 112	\$ -	\$ -	\$ -		\$ -	\$ -		
Miscellaneous											
Equipment for dry hole abandonment (420D 4W	\$ 99	\$ 99	\$ 99	\$ -	\$ -	\$ -		\$ -	\$ -		
Pilot car (Light Truck)	\$ 56	\$ 56	\$ 56	\$ -	\$ -	\$ -		\$ -	\$ -		
Truck Tractor + Lowbed Trailer 75 ton	\$ 150	\$ 150	\$ 150	\$ -	\$ -	\$ -		\$ -	\$ -		
Truck Tractor + Flatbed Trailer 40 ton	\$ 128	\$ 128	\$ 128	\$ -	\$ -	\$ -		\$ -	\$ -		
Light Truck + Flatbed Trailer 25 ton	\$ 78	\$ 78	\$ 78	\$ -	\$ -	\$ -		\$ -	\$ -		
							2		\$ 8,392		
Footnotes and explanations of assumptions											
(1) The sum of the cost of equipment from either the SRCE or RSM equipment tab plus Davis-Bacon labor tab											
(2) Assumes minimum of 30 minutes load and secure and 30 minutes unsecure and unload machine.											
(3) No "Deadhead" (empty) charge for Mob up to 50 miles. More than 50 miles the cost of deadhead same rate as loaded miles.											
(4) Only large equipment requires disassembly for transport. Includes cost of mechanic + mechanic's truck + crane operator + crane											
(5) Nevada Dept. of Transportation oversized permits are \$25 per trip or \$60 per year.											
(6) Sum of mobilization plus all ancillary costs for one way loaded and return empty.											
(7) Two transports are required but the second transport does not need pilot cars or permits or a heavy duty trailer.											
(8) Two transports required with both requiring full complement of pilot cars and permits.											
(9) For large mining operations mobilization may be required from more than one location. For example the Elko yard may not have four 631 scrapers. Additional equipment may need to mobilize from Reno, Las Vegas or Salt Lake City. Input the further distance here.											
(10) Pilot Car costs based on SRCE light truck costs and Davis-Bacon wages											
(11) SRCE costs based on July 2018 vendor quotes.											
(12) RS Means costs based on R.S. Means Heavy Construction Cost Data, 2018 Q2											
(13) Davis Bacon wages based on 2018 determination.											

**N-97262 — South Infill Basin Exploration Project
Cultural and Paleontological Resources Conditions**

Paradigm Minerals USA Corp. (the Operator) is informed that a Bureau of Land Management (BLM) Tonopah Field Office (TFO) archaeologist has conducted a records review of the location of N-97262. The Operator is informed that disturbance must be contained to the areas depicted on the map included with the decision letter. Disturbance outside of the areas depicted may cause unnecessary or undue degradation to a historic property and in accordance with 43 CFR 3809.421, the Operator is legally required to prevent unnecessary or undue degradation to historic properties. If the Operator knowingly causes unnecessary or undue degradation to historic properties, the Operator is subject to penalties under 43 CFR 3809.604, 43 CFR 3809.605, 43 CFR 3809.700, and the Archaeological Resources Protection Act (ARPA). The Operator is informed that the following conditions for cultural resources—including the procedures in place in the event cultural resources are encountered during the course of project activities—apply.

Cultural Resources

If historic or prehistoric artifacts or features are discovered during project activities, operations in the immediate area shall cease, and the resources shall be left intact. The Operator shall take measures to protect the discovered artifacts from further disturbance by employees or contractors. Additionally, the Operator shall notify the Tonopah Field Manager at (775) 482-7800 so that the resource may be evaluated. The BLM will, as appropriate, evaluate the significance of the find within 10 working days. The Operator shall not proceed with potentially disturbing activities until authorized to do so by the BLM.

Pursuant to 43 CFR 10.4(g), the holder of this Notice must notify the authorized officer, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary objects, and/or sacred objects of cultural patrimony (as identified at 43 CFR 10.2). Furthermore, pursuant to 43 CFR 10.4(c) and (d), the Operator must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

Paleontological Resources

Paleontological resources constitute a fragile and non-renewable scientific record of the history of life on earth. Although no paleontological resources are known or identified in the immediate area, this project may have an unintended adverse effect on such resources. The Operator should note that fossils are not part of the mineral estate. Paleontological resources are protected by the Paleontological Resources Protection Act (OPLA-PRP: Omnibus Public Land Management Act of 2009 Paleontological Resources Preservation Subtitle 123 Stat. 1172, 16 U.S.C. 470aaa et seq.) which establishes criminal and civil penalties. The Operator should also be aware that if paleontological resources are found in direct association with cultural resources, then such occurrences are subject to Archaeological Resource Protection Act (ARPA: 43 CFR 7.4, 7.14, 7.15, 7.16) provisions. OPLA-PRP requires that the nature and location of paleontological resources on public lands be kept confidential. If paleontological resources are discovered, the Operator must cease operations in the vicinity of the discovery and ensure adequate protection to the discovery, then notify the BLM immediately, by telephone, with written confirmation to follow. Notification should be made to Tonopah Field Office Manager, Tonopah Field Office, 1553 South Main Street, Tonopah, NV, 89049, (775-482-7800). No activity in the vicinity of the discovery should resume until the Operator has been issued a Notice to Proceed by the Authorized Officer.

**N-97262 — South Infill Basin Exploration Project
Other Resource Conditions**

Land and Realty

- T. 1 S., R. 37 E., section 34 contains Esmeralda County 2477 varied width access road (N-55403 & N-54404)
- Section 34 (N-55403) road is located in the N $\frac{1}{2}$ and SE corner & N-54404 is located in the SESE (N-54404);
- T. 2 S., R. 37 E., sections 3 & 10 contain Esmeralda County 2477 varied width access road (N-54404) located in the E $\frac{1}{2}$ of section 3; and NE and N $\frac{1}{2}$ SE corner of section 10. A pending ROW application to Esmeralda County Road Department is currently pending.

Wildlife, Wild Horse and Burros, Range, and T&E Animals

- Project falls within mapped year round bighorn sheep and mule deer habitat. No negative impacts anticipated.
- No known active Golden Eagle nests within 1 mile of project area. No negative impacts anticipated to Golden Eagles.
- Avoid land clearing activities during the migratory bird nesting season, if unavoidable ensure clearance surveys are conducted IAW 2014 Wildlife Survey Protocol.
- Ensure construction of pits are in a fashion that prevents the consumption of toxic fluids by wildlife and allows for safe egress/ingress.
- The project is in the Silver Peak Herd Management Area and the nearest wild equids observed during the 2018 aerial survey were 1.4 miles southwest of the drill holes. The nearest water source is Cave Spring. Wild horses, burros, and mules may pass through the project location, though not likely during active drilling.
- Located in the Silver Peak Allotment, it is unlikely that cattle will be in the project area.
- No known T&E plant species located in the project area. Tiehm buckwheat (*Eriogonum tiehmi*), a BLM Sensitive Plant Species may be found in this area. Drill holes, pads, and roads are located outside of Tiehm buckwheat occurrences (based on best available GIS data).
- No Nevada State Listed Noxious Weeds located in the project area. Use Best Management Practices to prevent spread of Noxious Weeds on BLM lands.
- Use Salt Desert Shrub seed mix when reseeded.

Recreation and public access

- Do not block or close accesses on existing roads.
- Visual Resource Management class IV; not within a Wilderness Study Area. Off road vehicle traffic should be expected in this region. Not on Special recreation permit.

Form 1842-1
(September 2006)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

INFORMATION ON TAKING APPEALS TO THE INTERIOR BOARD OF LAND APPEALS

DO NOT APPEAL UNLESS

1. This decision is adverse to you,
AND
2. You believe it is incorrect

IF YOU APPEAL, THE FOLLOWING PROCEDURES MUST BE FOLLOWED

- | | |
|-----------------------------|--|
| 1. NOTICE OF APPEAL..... | A person who wishes to appeal to the Interior Board of Land Appeals must file in the office of the officer who made the decision (not the Interior Board of Land Appeals) a notice that he wishes to appeal. A person served with the decision being appealed must transmit the <i>Notice of Appeal</i> in time for it to be filed in the office where it is required to be filed within 30 days after the date of service. If a decision is published in the FEDERAL REGISTER, a person not served with the decision must transmit a <i>Notice of Appeal</i> in time for it to be filed within 30 days after the date of publication (43 CFR 4.411 and 4.413). |
| 2. WHERE TO FILE | |
| NOTICE OF APPEAL..... | Bureau of Land Management, Tonopah Field Office, P. O. Box 911, 1553 S. Main Street, Tonopah, NV 89049-0911 |
| WITH COPY TO SOLICITOR..... | Regional Solicitor, Pacific Southwest Region, U.S. Department of the Interior, 2800 Cottage Way, Room E-2753, Sacramento, CA 95825-1890 |
| 3. STATEMENT OF REASONS | Within 30 days after filing the <i>Notice of Appeal</i> , file a complete statement of the reasons why you are appealing. This must be filed with the United States Department of the Interior, Office of Hearings and Appeals, Interior Board of Land Appeals, 801 N. Quincy Street, MS 300-QC, Arlington, Virginia 22203. If you fully stated your reasons for appealing when filing the <i>Notice of Appeal</i> , no additional statement is necessary (43 CFR 4.412 and 4.413). |
| WITH COPY TO SOLICITOR..... | Regional Solicitor, Pacific Southwest Region, U.S. Department of the Interior, 2800 Cottage Way, Room E-2753, Sacramento, CA 95825-1890 |
| 4. ADVERSE PARTIES..... | Within 15 days after each document is filed, each adverse party named in the decision and the Regional Solicitor or Field Solicitor having jurisdiction over the State in which the appeal arose must be served with a copy of: (a) the <i>Notice of Appeal</i> , (b) the Statement of Reasons, and (c) any other documents filed (43 CFR 4.413). |
| 5. PROOF OF SERVICE..... | Within 15 days after any document is served on an adverse party, file proof of that service with the United States Department of the Interior, Office of Hearings and Appeals, Interior Board of Land Appeals, 801 N. Quincy Street, MS 300-QC, Arlington, Virginia 22203. This may consist of a certified or registered mail "Return Receipt Card" signed by the adverse party (43 CFR 4.401(c)). |
| 6. REQUEST FOR STAY..... | <p>Except where program-specific regulations place this decision in full force and effect or provide for an automatic stay, the decision becomes effective upon the expiration of the time allowed for filing an appeal unless a petition for a stay is timely filed together with a <i>Notice of Appeal</i> (43 CFR 4.21). If you wish to file a petition for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the Interior Board of Land Appeals, the petition for a stay must accompany your <i>Notice of Appeal</i> (43 CFR 4.21 or 43 CFR 2801.10 or 43 CFR 2881.10). A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the <i>Notice of Appeal</i> and Petition for a Stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the appropriate Office of the Solicitor (43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.</p> <p>Standards for Obtaining a Stay. Except as otherwise provided by law or other pertinent regulations, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards: (1) the relative harm to the parties if the stay is granted or denied, (2) the likelihood of the appellant's success on the merits, (3) the likelihood of immediate and irreparable harm if the stay is not granted, and (4) whether the public interest favors granting the stay.</p> |

Unless these procedures are followed, your appeal will be subject to dismissal (43 CFR 4.402). Be certain that all communications are identified by serial number of the case being appealed.

NOTE: A document is not filed until it is actually received in the proper office (43 CFR 4.401(a)). See 43 CFR Part 4, Subpart B for general rules relating to procedures and practice involving appeals.

(Continued on page 2)

43 CFR SUBPART 1821—GENERAL INFORMATION

Sec. 1821.10 Where are BLM offices located? (a) In addition to the Headquarters Office in Washington, D.C. and seven national level support and service centers, BLM operates 12 State Offices each having several subsidiary offices called Field Offices. The addresses of the State Offices can be found in the most recent edition of 43 CFR 1821.10. The State Office geographical areas of jurisdiction are as follows:

STATE OFFICES AND AREAS OF JURISDICTION:

Alaska State Office -----	Alaska
Arizona State Office -----	Arizona
California State Office -----	California
Colorado State Office -----	Colorado
Eastern States Office -----	Arkansas, Iowa, Louisiana, Minnesota, Missouri and, all States east of the Mississippi River
Idaho State Office -----	Idaho
Montana State Office -----	Montana, North Dakota and South Dakota
Nevada State Office -----	Nevada
New Mexico State Office ----	New Mexico, Kansas, Oklahoma and Texas
Oregon State Office -----	Oregon and Washington
Utah State Office -----	Utah
Wyoming State Office -----	Wyoming and Nebraska

(b) A list of the names, addresses, and geographical areas of jurisdiction of all Field Offices of the Bureau of Land Management can be obtained at the above addresses or any office of the Bureau of Land Management, including the Washington Office, Bureau of Land Management, 1849 C Street, NW, Washington, DC 20240.

(Form 1842-1, September 2006)

ATTACHMENT H



December 5, 2019

Via email and regular mail

Mr. Perry Wickham
Bureau of Land Management
Tonopah Field Office
P.O. Box 911 (1553 South Main Street)
Tonopah, Nevada 89049-0911

Re: NVN-097262 Loneer USA Corporation - South Infill Exploration Project

Dear Mr. Wickham:

By this correspondence, Loneer USA Corporation (Loneer) notifies the Tonopah Office of the Bureau of Land Management (BLM) that Loneer has ceased all operations under the above-mentioned Notice. Loneer understands that BLM can order reclamation under 43 C.F.R. Section 3809.335b. This cessation notice is being provided pursuant to 43 C.F.R. Section 3809.332.

Please call me if you have any questions regarding this correspondence.

Regards,

A handwritten signature in blue ink that reads "Matt Weaver".

Matt Weaver
Senior Vice President Operations



ATTACHMENT I



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
Tonopah Field Office
P.O. Box 911 (1553 South Main Street)
Tonopah, Nevada 89049
Phone: 775-482-7800 Fax: 775-482-7810
www.blm.gov/nevada

In Reply Refer To:
N-97262
3809 (NVB0200)

DEC 06 2019

CERTIFIED MAIL - RETURN RECEIPT REQUESTED 7019 0700 0000 6677 7588

DECISION

Loneer USA Corp.	:	
Matt Weaver, Senior VP	:	Surface Management
241 Ridge St., #210	:	
Reno, NV 89501	:	

RELINQUISHMENT OF NOTICES ACCEPTED – NOTICES TERMINATED, RECLAMATION REQUIRED

On December 5, 2019, the Bureau of Land Management (BLM) received notification from Loneer USA Corp. (Loneer) of its intent to relinquish under BLM's regulations at 43 CFR 3809 Notice, N-97262, located in Esmeralda County, Nevada in Township 1 South, Range 37 East, section 34 and Township 2 South, Range 37 East, sections 3 & 10, Mount Diablo Base & Meridian. The BLM accepts Loneer's relinquishment and the notices are hereby terminated as of this date, December 5, 2019. Under this status, all surface disturbance and mining related activities, except reclamation, are not authorized and must cease as required by 43 CFR 3809.335(b). Any unauthorized activities continuing after the termination date will be subject to enforcement actions.

If you file a new Notice or Plan of Operations, the requirements of the 43 CFR 3809 regulations, including, but not limited to, environmental review of Plans of Operations under the National Environmental Policy Act, and full cost bonding under 43 CFR 3809.500 is required for both Notice- or Plan-level operations, prior to beginning or resuming operations.

Reclamation Required

Within 30 days of receiving this decision, you must commence the reclamation required by your Notice on file with the BLM. All reclamation, including required equipment removal, earthwork, borehole plugging, monitor well(s) abandonment pursuant to Nevada State standards, sump and well pad removal, overland travel, and road removal, repair, and reseedling must be completed within 90 days of this decision. The BLM will continue to monitor your progress in meeting your reclamation obligations, including the success of the revegetation in the disturbed area. The BLM will inform you when all reclamation standards have been met and whether your financial guarantee amount may be reduced or released. Should you fail to commence reclamation within

30 days of receipt of this decision or fail to complete necessary reclamation within 90 days of receipt of this decision, the BLM may initiate forfeiture of all or part of your financial guarantee as provided for under 43 CFR 3809.336(b) and 43 CFR 3809.595. You may also be subject to enforcement actions under 43 CFR 3809.601.

Reclamation may be deferred, if you file a new Notice or Plan of Operations for the project area within 30 days. If determined to be complete, BLM will defer this reclamation required under this decision until the notice is accepted or the plan is approved.

Appeal of the Decision

If you are adversely affected by this decision, you may request that the BLM Nevada State Director review this decision. If you request a State Director Review, the request must be received in the BLM Nevada State Office at 1340 Financial Blvd., Reno, Nevada 89502, no later than 30 calendar days after you receive or have been notified of this decision. The request for State Director Review must be filed in accordance with the provisions in 43 CFR 3809.805. This decision will remain in effect while the State Director Review is pending, unless a stay (suspension) is granted by the State Director. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

If the State Director does not make a decision on your request for review of this decision within 21 days of receipt of the request, you should consider the request declined and you may appeal this decision to the Interior Board of Land Appeals (IBLA). You may contact the BLM Nevada State Office to determine when the BLM received the request for State Director Review. You have 30 days from the end of the 21-day period in which to file your Notice of Appeal with this office at P.O. Box 911, 1553 S. Main St, Tonopah, NV 89049, which we will forward to IBLA.

If you wish to bypass a State Director Review, this decision may be appealed directly to the IBLA in accordance with the regulations at 43 CFR 3809.801(a) (1). Your Notice of Appeal must be filed in this office at P.O. Box 911, 1553 S. Main St, Tonopah, NV 89049, within 30 days from receipt of this decision. As the appellant, you have the burden of showing that the decision appealed from is in error. Enclosed is BLM Form 1842-1 that contains information on taking appeals to the IBLA.

This decision will remain in effect while the IBLA reviews the case, unless a stay is granted by the IBLA. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Request for a Stay

If you wish to file a petition (request) pursuant to regulations 43 CFR 4.21 for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by IBLA, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of this notice of appeal and petition for a stay must also be submitted to each party named in the decision and to the IBLA and to the appropriate Office of the Solicitor (see 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal must show sufficient justification based on the following standards:

1. The relative harm to parties if the stay is granted or denied.
2. The likelihood of the appellant's success on the merits.
3. The likelihood of immediate and irreparable harm if the stay is not granted.
4. Whether the public interest favors granting the stay.

If you have any questions, please contact Jonah Blustain, Assistant Field Manager, Non-Renewable Minerals, at (775) 482-7843.

A handwritten signature in black ink, appearing to read 'Perry B. Wickham', with a large, stylized initial 'P'.

Perry B. Wickham
Field Manager

Enclosures

cc: BLM Nevada State Office
Branch of Mineral Resources (Solids)

Form 1842-1
(September 2006)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

INFORMATION ON TAKING APPEALS TO THE INTERIOR BOARD OF LAND APPEALS

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AND
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WITH COPY TO SOLICITOR...	Regional Solicitor, Pacific Southwest Region, U.S. Department of the Interior, 2800 Cottage Way, Room E-2753, Sacramento, CA 95825-1890
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(Continued on page 2)

43 CFR SUBPART 1821--GENERAL INFORMATION

Sec. 1821.10 Where are BLM offices located? (a) In addition to the Headquarters Office in Washington, D.C. and seven national level support and service centers, BLM operates 12 State Offices each having several subsidiary offices called Field Offices. The addresses of the State Offices can be found in the most recent edition of 43 CFR 1821.10. The State Office geographical areas of jurisdiction are as follows:

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California State Office -----	California
Colorado State Office -----	Colorado
Eastern States Office -----	Arkansas, Iowa, Louisiana, Minnesota, Missouri and, all States east of the Mississippi River
Idaho State Office -----	Idaho
Montana State Office -----	Montana, North Dakota and South Dakota
Nevada State Office -----	Nevada
New Mexico State Office ----	New Mexico, Kansas, Oklahoma and Texas
Oregon State Office -----	Oregon and Washington
Utah State Office -----	Utah
Wyoming State Office -----	Wyoming and Nebraska

(b) A list of the names, addresses, and geographical areas of jurisdiction of all Field Offices of the Bureau of Land Management can be obtained at the above addresses or any office of the Bureau of Land Management, including the Washington Office, Bureau of Land Management, 1849 C Street, NW, Washington, DC 20240.

(Form 1842-1, September 2006)

EXHIBIT 2

October 29, 2019 Letter from CBD to BLM



October 29, 2019

Mr. Jon Raby
Nevada State Director
Bureau of Land Management
1340 Financial Blvd.
Reno, NV 89502

Re: Ongoing mineral exploration activities at Rhyolite Ridge affecting Tiehm's buckwheat

Mr. Raby:

As you are aware, the company Ioneer has been conducting mineral exploration activities in the Rhyolite Ridge area of the Silver Peak Range in Esmeralda County, Nevada. These activities are in preparation for a proposed lithium-boron open-pit mine in the area. Within the proposed footprint of the mine lies the entire global population of Tiehm's buckwheat (*Eriogonum tiehmii*), a very rare plant in the buckwheat family whose entire global population is constrained to 20,000-43,000 individuals occurring on 10 acres of habitat spread across 3 square miles.

On June 12, 2019, we sent a letter to the Nevada Department of Conservation and Natural Resources, providing 30-day notice of our intention to petition U.S. Fish and Wildlife Service to list Tiehm's buckwheat under the Endangered Species Act. In this letter we urged "the state, BLM, and USFWS to work together to cease all exploration activities within or adjacent to Tiehm's buckwheat habitat until proper environmental review can be conducted and the petition can be evaluated."

On October 7, 2019, we submitted a petition to the U.S. Fish and Wildlife Service (U.S. FWS), and a simultaneous petition to the Nevada Division of Forestry (NDF), seeking endangered species protections for Tiehm's buckwheat, in light of the imminent peril it faces from mineral exploration activities and the ongoing threat of potential open-pit mine development in the area.

On October 27, 2019, we visited the Rhyolite Ridge area and were shocked to find a substantial increase in mineral exploration activities. We observed five trucks, two pieces of heavy equipment, and at least six personnel on site, with substantial excavation and grading having been conducted within days or weeks prior to our visit, pipeline laid, wells pumped, wastewater pits filled, and other evidence of substantial exploration activities ongoing in the immediate area of Tiehm's buckwheat.

We are gravely concerned that BLM is intentionally accelerating exploration activities at the Rhyolite Ridge site in order to sidestep the evaluation process that U.S. FWS and NDF are undertaking of our petitions.

Further, it has become clear that BLM has illegally segmented two separate mineral exploration notices (NVN-097262 [South Infill] and NVN-097202 [Rhyolite Ridge]), each of less than the National Environmental Protection Act (NEPA)-triggering size of 5 acres as provided in BLM's regulations, but cumulatively over 8 acres of impacts. This appears to be done in an attempt to avoid doing an environmental review as mandated by NEPA and BLM's own regulations.

BLM must immediately instruct Ioneer to cease and desist exploration activities conducted under these exploration notices while U.S. FWS and NDF evaluate the petitions, and while NEPA is properly conducted as is required by FLPMA and pertinent regulations. If such activities do not cease immediately, we will be forced to pursue legal action to protect the buckwheat and its habitat from imminent destruction. Unless we have notification in writing from your office by noon, pacific standard time, on Wednesday, October 30th that exploration activities in the Rhyolite Ridge area have ceased, we will file suit in the District of Nevada court on Wednesday, October 30th, and intend to seek injunctive relief shortly thereafter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Patrick Donnelly". The signature is fluid and cursive, with the first name "Patrick" and last name "Donnelly" clearly distinguishable.

Patrick Donnelly

Nevada State Director

Center for Biological Diversity

7345 S. Durango Dr., B-107, Box 217

Las Vegas, NV 89113

702.483.0449 | pdonnelly@biologicaldiversity.org

CC:

Lee Ann Carranza, U.S. Fish and Wildlife Service- Reno

Kasey KC, Nevada Division of Forestry

Brad Crowell, Nevada Department of Conservation and Natural Resources

Daniel Jorjani, Solicitor, Department of the Interior



Construction crew on-site and working on October 27, 2019, with freshly graded roads and pads.



Freshly graded road into area of Tiehm's buckwheat populations 4 and 5 as observed October 27, 2019.